

Compliance Officer Designation

Policy # CC - 101
Date Effective: 07/17/2007
Date Revised: 08/05/2017
Approved by: Michael Burns

Purpose: *To designate responsibility and accountability to an executive level person in the company if other than President/Owner.*

Policy: *Cathy Stephens shall act as and perform all functions of the Compliance Officer.*

Procedure:

1. Review all Fraud Awareness Policies and Procedures on an annual basis.
2. Monitor claims for denial and audit the billing records on a quarterly basis.
3. Verify completion of Fraud Awareness training for all staff upon hire and then annually. (Training is issued by Human Resources).
4. All suspicious activity will be reported to the Compliance Officer who will investigate and take any necessary corrective action.

Compliance Officer

QUALIFICATIONS:

Strong health care management background. Expertise in operations preferred. Knowledge of Health Care Fraud and compliance issues.

RESPONSIBILITIES:

1. Review all Fraud Awareness Policies and Procedures on an annual basis.
2. Monitor claims for denial and audit the billing records on a quarterly basis.
3. Perform all Fraud Awareness training for all staff upon hire and then annually.
4. Investigate and take any necessary corrective action regarding all suspicious activity.
5. Responsible for reporting alleged incidents of such to the Office of the Inspector General.

Conflict of Interest/Ethics

Policy # CC - 102
Date Effective: 07/17/2007
Date Revised: 04/21/2014
Approved by: Michael Burns

Purpose: *To secure a proper business environment and promote ethical conduct.*

Policy: *All staff should conduct business in an ethical manner. No employee should engage in any activity construed as direct competition to the company or accepting financial gain through that activity. Any relationship with other business entities must be within the law and regulations.*

Procedure:

1. The governing board is committed to conducting its business honestly, ethically and in compliance with applicable laws and regulations.
2. The governing board decides what constitutes a conflict of interest to the organization.
3. All employees upon hire are oriented to what constitutes a conflict of interest to the organization as defined by the governing board.
4. All employees suspecting a conflict of interest or questioning the ethics of a certain business relationship should report the situation to their immediate supervisor.
5. All employees are encouraged to report good faith concerns about violations of laws, regulations or policies. Retaliation against an employee for making a good faith report of potential legal or policy violations is prohibited and may subject the violator to disciplinary action.

Standards of Conduct

Policy # CC - 103
Date Effective: 07/17/2007
Date Revised: 09/24/2013
Approved by: Michael Burns

Purpose: *To secure a proper business environment through the practice of proper business standards of conduct.*

Policy: *All staff shall follow the guidelines established in the Standards of Conduct.*

Procedure:

1. Standards of Conduct must be posted.
2. Standards of Conduct must be signed by each employee and placed in their personnel file.
3. Standards of Conduct must be signed and reviewed annually.

Marketing

Policy # CC - 104
Date Effective: 09/19/2007
Date Revised: 05/22/2018
Approved by: Michael Burns

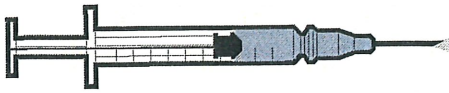
Purpose: *To ensure that marketing materials reflect the services and products offered.*

Policy: *All marketing materials reflect the features and benefits of the services or products offered by this organization. They shall be factual, informative, honest and not vague or misleading.*

See Attached Examples of Marketing Materials

AUBURN
PHARMACY

Shingles Vaccine



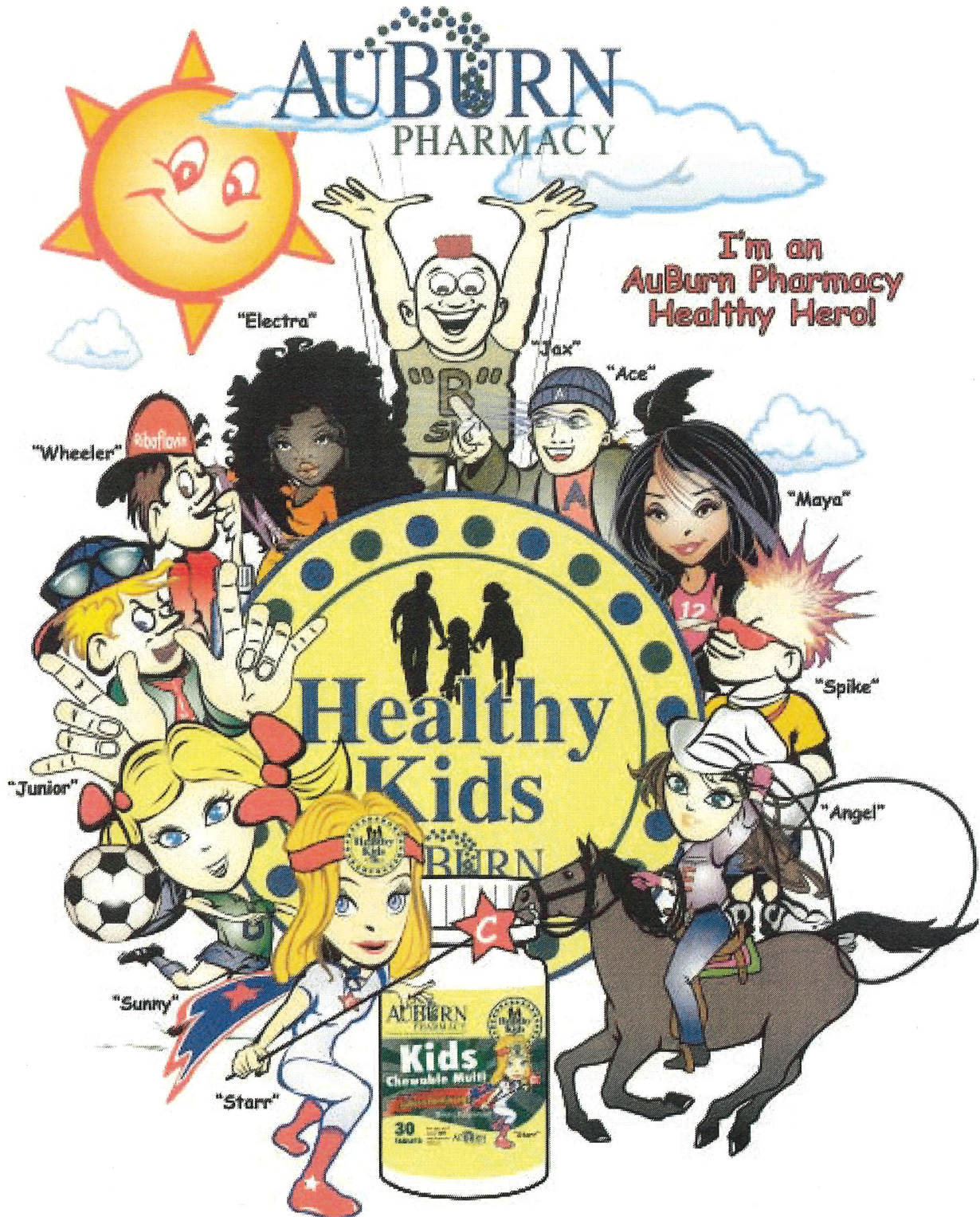
VACCINATION STATION

- *Influenza*
- *Shingles*
- *Hepatitis A*
- *Hepatitis B*
- *Pneumonia*
- *Meningitis*
- *TDap*

Walk-in FLU SHOTS EVERYDAY!

FREE Vitamin Program!

Healthy Heroes promote, Healthy Habits, Healthy Children...Enroll your child today!



Let's make being **HEALTHY FUN!**

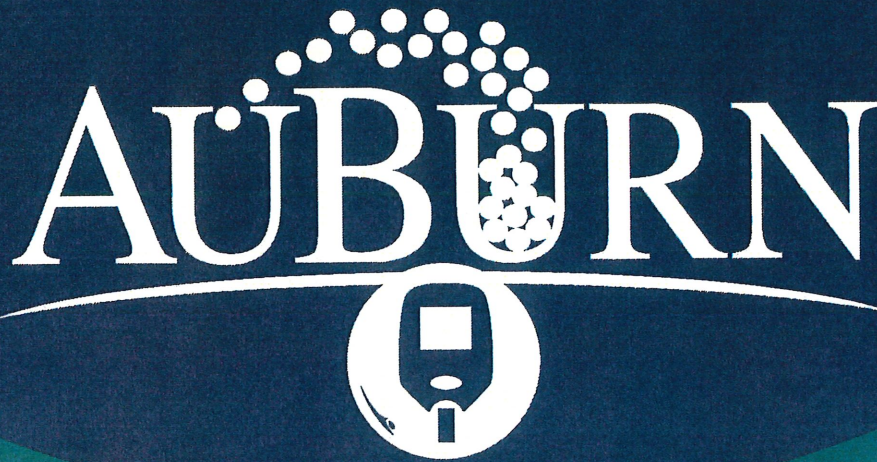
AUBURN

AdvantaCARE

AdvantaCare helps our patients attain better medication adherence and simplify their lives. To achieve the best therapeutic outcomes, the program is specifically designed to accomplish this by actively engaging patient involvement in their healthcare, synchronizing all medication refills into one monthly refill and improving communication between patients, physicians and Auburn Pharmacists.



www.auburnpharmacies.com



New Topic Every Month!

Join us in the
AuBurn Corporate,
259 W Park Rd, Garnett, KS 66032

The next class will be conducted by Nate Wiehl, PharmD

Fourth Thursday at 4pm

Diabetes Education For Everyday Living Classes

Please contact:
785-448-3600
For more information



Online refills are available at:
www.auburnpharmacies.com

Have you received your pair of diabetic shoes and inserts this year?

Give us a call today!

We'd love to walk you through it!



"Diabetes education for daily living"



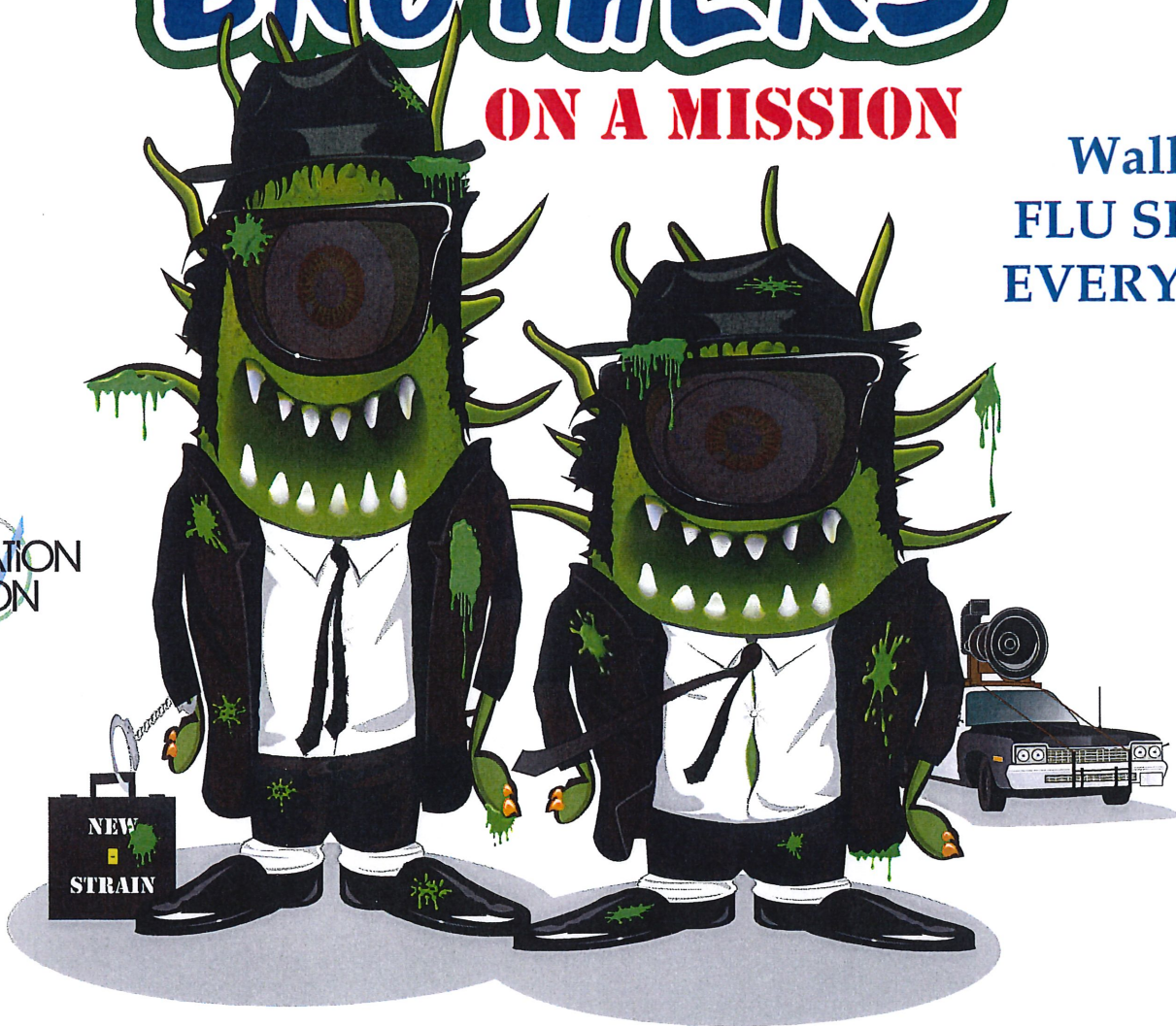
AUBURN PHARMACY

THE **FLU'S** **BROTHERS**

ON A MISSION

Walk-in
FLU SHOTS
EVERY DAY

VACCINATION
STATION



**DON'T LET THE FLU'S BROTHERS ACCOMPLISH THEIR MISSION OF
SPREADING THE FLU THIS SEASON. PROTECT YOURSELF BY GETTING
YOUR FLU SHOT TODAY!**

GET YOUR FLU SHOT HERE TODAY!

AUBURN PHARMACY

medela

*Find out how you can get
your breastpump
through insurance!*

- Authorized DME Provider & Biller
- Authorized retailer of Medela breastpumps and accessories
- FREE insurance benefit check to determine coverage
- We accept FSA/HSA cards! Use your card to pay for eligible breastfeeding products.
- Consult with an AuBurn Pharmacist about the safety of your current medication while breastfeeding



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FLU BUSTERS

ZAP!



GIVE THE FLU THE ZAP! THIS SEASON

AUBURN
PHARMACY

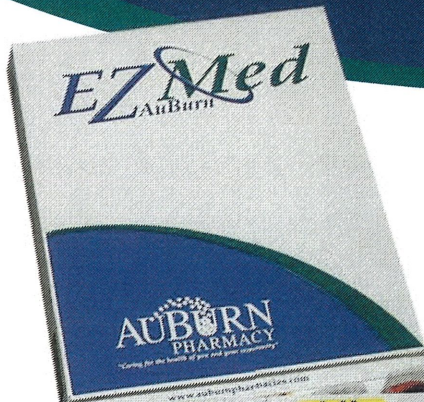
GET YOUR FLU SHOT TODAY!

There is no charge for this service to Medicare Recipients. CARD MUST BE PRESENTED AT TIME OF SERVICE.
* Flu-Shot recipients must be age 6 or older in Kansas and 7 or older in Missouri.

VACCINATION
STATION

EZMed

AuBurn

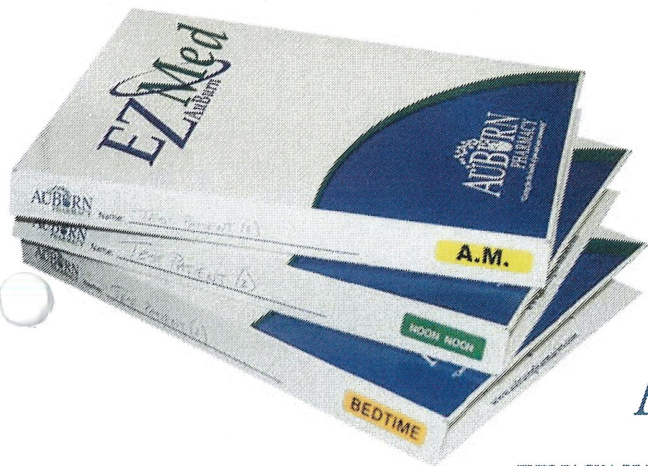


EZMed pricing:

1-5 medications: \$10 each month
6-10 medications: \$16 each month
11+ medications: \$20 each month



- Save time
- Increased safety
- Peace of mind
- Let Pharmacist handle refills
- In store pick up, delivery or mail options



EZMed

AuBurn

AUBURN
PHARMACY

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Medical Necessity & Physician Notification

Policy # CC - 105
Date Effective: 08/29/2007
Date Revised: 05/22/2018
Approved by: Michael Burns

Purpose: *To ensure all supporting documentation is obtained and accurate.*

Policy: *All orders for equipment/services need to be accompanied by medical necessity documentation from the ordering physician.*

Procedure:

1. Upon the completion of an order for medical equipment, the patient's needs and equipment availability are determined.
2. Medical necessity documentation is obtained as it is reflected in the guidelines established by the coverage criteria for the specific piece of equipment. Including but not limited to physician's notice and/or Certificate of Medical Necessity if applicable.
3. The patient's file is stored and retained for a period of 10 years. Minor files are kept until the 18th birthday plus an additional 7 years.
4. Physician license and expiration date are verified on an annual bases. Staff at each location will also verify that physician is enrolled in PECOS and that their NPI number is active. Documentation is kept electronically in pharmacy software as a note on the physician. This note will be date and time stamped in relation to when verification occurred.

Fraud Awareness Training

Policy #CC - 106
Date Effective: 09/19/2007
Date Revised: 04/04/2016
Approved by: Michael Burns

Purpose: *To instruct the organization's employees on all Policies and Procedures.*

Policy: *Employee Training begins on the Day of Hire. Instruction is repeated on an annual basis or as indicated by new services, products or when individual performance signifies a need for additional training.*

Procedure:

1. A Training Checklist, which details the new hire's duties is completed, and placed in the employee's personnel file.
2. Orientation to new services, procedures or products will take place as these developments occur or a minimum of once a year.
3. Training is given according to the employee's job description. An evaluation of this training is made by the employee's immediate supervisor.
4. Training on Fraud Awareness is completed upon hire and then on an annual basis.
5. Training is completed in the following areas:
 - * Corporate Compliance Plan – Fraud, Waste, Abuse Awareness
 - * Standards of Conduct
 - * Conflict of Interest/Ethics
 - * Employee/Employer Rights and Responsibilities
 - * Quality Improvement
 - * Federal Health and Human Services Hotline numbers
 - * Sample case studies (www.oig.hhs.gov)
 - * Disciplinary Action and Corrective Action.

Disciplinary & Corrective Action

Policy # CC - 107
Date Effective: 08/29/2007
Date Revised: 08/28/2019
Approved by: Michael Burns

Purpose: *To inform staff of the consequences involved in non-compliance.*

Policy: *Any staff member suspected of wrongdoing will be investigated by the Compliance Officer. Depending on the degree and extent of the misconduct corrective action will be taken.*

Procedure:

Disciplinary Action

1. If an employee violates company rules of conduct, they will be counseled and it will be noted in their personnel file.
2. If the offense is repeated by the same employee, termination is warranted.
3. If the wrongdoing involves suspected criminal activity, corrective action takes place immediately.

Corrective Action (Investigation Phase)

1. Relevant documents are reviewed to determine if criminal activity has occurred. (The Compliance Officer is responsible for reporting any criminal activity and making restitution if appropriate.)
2. If during the investigation, the Compliance Officer believes that the integrity of the investigation will be compromised, the employee under suspicion will be suspended until the investigation is completed.
3. Once an investigation is completed, if disciplinary action is warranted it should take place immediately.

(Continued Page 2)

Disciplinary & Corrective Action

(Continued)

Policy # CC - 107
Date Effective: 08/29/2007
Date Revised:08/28/2019
Approved by: Michael Burns

Corrective Action (Reporting Phase)

If the Compliance Officer received credible evidence of misconduct from any source and after investigation has reasonable grounds to believe that the misconduct either:

- (a) Violates criminal law, or
- (b) Constitutes a material violation of civil law, rules and regulations governing federally funded health care programs then the organization should report the existence of the misconduct to: Office of the Inspector General, US Department of Health and Human Services, and AuBurn Pharmacy Humana Resources Department.

(It is recommended that the organization give notice to the OIG within 60 days after receipt of the credible evidence of misconduct.) After reporting, the investigation should continue, and once completed the OIG and Department Of Justice should be notified of the outcome. If the investigation reveals that criminal activity may have occurred the appropriate State and Federal authorities should then be notified.

Corrective Action (Final Phase)

If the investigation reveals that criminal misconduct did occur, the employee(s) involved are immediately terminated.

If as a result of misconduct, the organization received overpayments, the organization should make prompt restitution of such sums to the appropriate authorities.

Note:

The organization prohibits employment of individuals who have been convicted of a criminal offense related to health care or who are charged with criminal offenses related to health care. (ie: currently on the OIG list)