

ORGANIZATIONAL PROCEDURE

PROCEDURE TITLE: COMPLIANCE OVERSIGHT COMMITTEE			
Topic Area: CORPORATE COMPLIANCE Applies to: LRE Staff and Operations	ISSUED BY: Chief Executive Officer	REVIEW DATES	
Review Cycle: Annually			
Developed and Maintained by: Chief Compliance Officer			
Supersedes: N/A	Effective Date: 7/22/22	Revised Date: July 7, 2022	

I. PURPOSE

The Lakeshore Regional Entity (LRE) shall maintain a Compliance Oversight Committee (COC) that will advise the Chief Compliance Officer (CCO), Chief Executive Officer (CEO), and the LRE Board in overseeing the implementation and operation of the Lakeshore Regional Entity Compliance Program. The COC will review reports and recommendations made by the LRE CCO regarding compliance activities. This includes data regarding compliance information and activities generated through audits, monitoring, and individual reporting.

The COC serves as an informational and advisory resource for the CCO and establishes a communication link between the employees and the compliance function.

The COC's purpose is accomplished through the fulfillment of duties and responsibilities of each member at the operational level, and by reviewing reports and recommendations made by the LRE CCO regarding compliance activities, which are all an integral part of the LRE's commitment to compliance.

II. PROCEDURE

1. Duties and responsibilities of the Oversight Committee shall include the following:
 - A. Reviewing the Compliance Plan and related policies to ensure they adequately address legal requirements and identified risk areas;
 - B. Analyzing the regulatory environment in which the LRE organization operates within, the legal requirements with which it must comply and specific risk areas;
 - C. Analyzing the effectiveness of the compliance program and make recommendations accordingly;
 - D. Assisting the Chief Compliance Officer with developing policies and procedures to promote compliance with the Compliance Plan;
 - E. Assessing existing policies and procedures that address these areas for possible incorporation into the compliance program;

- F. Assisting the Chief Compliance Officer in identifying potential risk areas and violations;
- G. Advising and assisting the Chief Compliance Officer with compliance initiatives;
- H. Working with appropriate departments, as well as affiliated providers, to develop standards of conduct and policies and procedures that promote allegiance to LRE compliance program;
- I. Recommending and monitoring, in conjunction with the relevant functional area leaders, the development of internal systems and controls to carry out LRE standards, policies and procedures as part of its daily operations;
- J. Determining the appropriate strategy/approach to promote compliance with the LRE compliance program and detection of any potential violations, such as through hotlines and other fraud reporting mechanisms;
- K. Developing a system to solicit, evaluate and respond to complaints and problems; and
- L. Monitoring internal and external audits and investigations for the purpose of identifying troublesome issues and deficient areas experienced by LRE and implementing corrective and preventive action;
- M. Receiving, interpreting, and acting upon reports and recommendations from the Chief Compliance Officer;
- N. Providing a forum for the discussions of compliance related issues.

The Compliance Oversight Committee may also address other functions as the compliance program becomes part of the overall operating structure and daily routine.

MEETING SCHEDULE

The Compliance Oversight Committee will meet at minimum quarterly and whenever unique situations arise that require such a meeting.

2. The Compliance Oversight Committee will be chaired by the Chief Compliance Officer. It is the policy of LRE that the Compliance Oversight Committee be comprised of additional individuals with varying responsibilities within the organization, including but not limited to operations, finance, human resources, utilization review, claims processing, information systems, legal, one member representative as well as employees and managers of key functional units. These individuals should have the requisite seniority and comprehensive experience within their respective functional areas to implement any necessary changes in LRE policies and procedures. Compliance Oversight Committee members should demonstrate high integrity, good judgment, assertiveness, and an approachable demeanor, while eliciting the respect and trust of the employees of the organization.

III. ORGANIZATIONAL STRUCTURE

The Compliance Oversight Committee is chaired by the Chief Compliance Officer. The COC will be comprised, per LRE policy, by additional individuals with varying responsibilities within the organization.

The membership will consist of the following individuals:

- Chief Executive Officer (CEO)
- Chief Operating Officer (COO)
- Chief Financial Officer (CFO)
- Chief Quality Officer (CQO)
- Chief Compliance Officer (COO)
- Chief Internet Technology Officer (CIO)
- Legal Counsel

These individuals should have the requisite seniority and comprehensive experience within their respective functional areas to implement any necessary changes in the LRE's policies and procedures.

These members encompass the operational functions within the various units comprising the LRE

I. APPLICABILITY AND RESPONSIBILITY

This policy applies to LRE staff and operations.

II. MONITORING AND REVIEW

The Chief Compliance Officer, in conjunction with the Chief Executive Officer, will review this policy on an annual basis.

III. DEFINITIONS

None

IV. RELATED POLICIES AND PROCEDURES

- A. Lakeshore Regional Entity Corporate Compliance Plan
- B. 9.1 Corporate Compliance

V. REFERENCES/LEGAL AUTHORITY

- A. 42 CFR, Ch. IV §438.608
- B. Federal Register Volume 64, No. 219

VI. CHANGE LOG

Date of Change	Description of Change	Responsible Party
06/26/2014	New Policy	Chief Compliance Officer
7/22/22	Annual Review- Rescinded Policy and Adapted as Procedure	Chief Compliance Officer