

COPA Compliance Office – Quarterly Report for FY 2018 4th Quarter

Covering 04/01/2018 – 06/30/2018 “Reporting Period”

Submitted pursuant to the Terms of Certification Governing the Certificate of Public Advantage Issued to Ballad Health Pursuant to the Master Affiliation Agreement and Plan of Integration by and between Wellmont Health System and Mountain State Health Alliance Approved on September 19, 2017 and Issued on January 31, 2018 (“TOC”) and the Virginia Order and Letter Authorizing a Cooperative Agreement dated October 30, 2017 (“CA”).

CERTIFICATION OF COMPLIANCE WITH THE TOC AND THE CA

Pursuant to section 6.04(a) of the TOC, the undersigned hereby certifies the following report and its attachments are true and correct to the best of his/her knowledge after due inquiry and are accurate and complete.



Gary Miller
Sr. Vice President
Interim COPA Compliance Officer
Ballad Health

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COPA COMPLIANCE OFFICE QUARTERLY REPORT

1. Requirements. Section 6.04 of the TOC requires the quarterly submission of the items listed on Exhibit G attached to the TOC. The section of Exhibit G relevant to Quarterly Reports is attached hereto as Attachment 1.

2. COPA Compliance Office (CCO) Quarterly Report. Description of process for receipt of all compliance complaints – TOC: 6.02, Exhibit F
 - a. The CCO has established a process for all Certificate of Public Advantage and Cooperative Agreement (“COPA”) related complaints to be documented. All Ballard Health Team Members have access to an AlertLine that they may call anonymously to register complaints or concerns, 1-800-535-9057. Additionally, a description of the CCO and the process for filing complaints has been added to the Ballard Health external website and includes a link to an email address for COPA Compliance, copa.compliance@balladhealth.org.

 - b. During the Reporting Period covered by this report there were no complaints filed with the CCO.

3. Three of the COPA Compliance Office policies were revised based on feedback from the state communicated via memorandum from Ward Nelson and Ken Connor dated June 22, 2018
 - COPA Compliance Officer – Duties and Responsibilities: Policy ADM-110-005-BH – Attachment 2a
 - COPA Compliance Program Description : Policy ADM-110-006-BH – Attachment 2b
 - COPA Interpretation and Communications with State Officials: – Policy ADM-110-010-BH - Attachment 2c

Attachment 1a
TOC, Exhibit G, Page 3

The Department reserves the right to change these quarterly reporting requirements upon adequate notice.

- Any revisions to Charity Care Policy; Section 4.03(e).
- Report of Population Health and Social Responsibility Committee meetings and member attendance at meeting; Section 4.04(e).
- Key Financial Metrics (comparing each to same quarter in prior year and the quarter prior to the quarter in question); Section 6.04(c).
 - o Balance sheet
 - o Statements of income and cash flow
- YTD Community Benefit Spending
 - o By Category, compared to commitment spending
 - Progress towards distributing grants
 - Internal spending
- Quality Metrics reported to CMS
- Once, within thirty (30) days of the Issue Date: a List of Ancillary and Post-Acute Services offered by competitors (with respect to each COPA Hospital); Section 5.04(a).
 - o Includes but is not limited to: SNF; home health providers; diagnostic service providers; imaging centers; ambulatory surgery centers; physicians and other providers; etc.
 - o Include at least three competitors for each category of service.
- **Compliance Office Quarterly Reports**
 - o **Complaints by type**
 - o **Resolution of complaints**
- Status of any outstanding Cures, Corrective Actions, or other remedial actions.
- Any requirements or commitments outlined in the Terms of Certification or in the Index which the New Health System is not meeting or anticipates it will not meet
- Closures / Openings
 - o Plans. Update on plans to close or open any Service Lines or facilities.
 - o Progress. Update on the status of any closures or openings of facilities or Service Lines.

**ATTACHMENT 2a - Revised Policy
COPA Compliance Officer – Duties and Responsibilities**

POLICY NUMBER: ADM-110-005-BH			
Folder:	Administration/Operation	Effective Date:	April 12, 2018
		Previous Version Date:	NEW
Sub Folder:	Compliance/COPA	Last Reviewed/Revised:	April 12, 2018
COPA COMPLIANCE OFFICER – DUTIES AND RESPONSIBILITIES – BALLAD HEALTH			

I. PURPOSE:

To outline guidelines for Ballad Health for the COPA Compliance Officer outlining the duties and responsibilities to comply with the COPA requirements.

II. SCOPE:

All team members, Physicians, volunteers, students, independent contractors and vendors

III. FACILITIES/ENTITIES:

Ballad Health Corporate

Tennessee: BRMC, FWCH, HCH, HCMH, HVMC, IPMC, JCCH, JCMC, LMH, SSH, TRH, UCMH, WPH, Kingsport Day Surgery (a separate legal entity managed by Ballad Health), Niswonger Children’s Hospital, New Leaf, Laughlin Healthcare Center, Madison House, Unicoi County Nursing Home, Wellmont Hospice House, Wexford House

Virginia: DCH, JMH, LPH, MVRMC, NCH, RCMC, SCCH, Clearview Psychiatric Unit, Francis Marion Manor Health & Rehabilitation, Green Oak Behavioral Health (Geriatric Behavioral Health Inpatient Program – DCH), Ridgeview Pavilion, Mountain View Regional Medical Center Skilled/Long Term Care Unit, Norton Community Physicians Services (NCPS), Community Home Care (CHC), Abingdon Physician Partners (APP)

Blue Ridge Medical Management Corporation

Bristol Surgery Center, LLC

Holston Valley Imaging Center

Home Health/Hospice

Integrated Solutions Healthcare Network (ISHN)

Laughlin Medical Group (LMG)

Mountain States Pharmacy at Norton Community Hospital

Sleep Services

Takoma Medical Associates

Wellmont Cardiology Services

Wellmont Medical Associates

Wilson Pharmacy, Inc.

WPS Providers, Inc.

IV. DEFINITIONS:

A. **COPA:** Certificate of Public Advantage

V. POLICY:

A. DUTIES AND RESPONSIBILITIES

1. The COPA Compliance Officer oversees the Ballad Health COPA Compliance Program, which reviews and evaluates compliance within the organization relating to the requirements set forth in the following documents:
 - a. Terms Of Certification Governing the Certificate of Public Advantage Issued to Ballad Health by the Tennessee Department of Health (the "Tennessee TOC");
 - b. The Order and Letter Authorizing a Cooperative Agreement issued by the State Health Commissioner of the Commonwealth of Virginia (the "Virginia Order"); and
 - c. The applicable statutes and regulations governing the Certificate of Public Advantage in Tennessee and the Cooperative Agreement in Virginia (collectively referred to as the "COPA Requirements").
2. The COPA Compliance Officer shall, at all times, be an individual with proper training in compliance, be qualified to perform investigatory functions, and be knowledgeable generally about hospital and health system operations.
 - a. The COPA Compliance Officer will be employed by Ballad Health but his/her employment can only be terminated with the written approval of the Tennessee Commissioner of Health.
 - b. The COPA Compliance Officer will report jointly to the Executive Chair/President and to the Audit and Compliance Committee of the Ballad Health Board of Directors.

B. PRIMARY RESPONSIBILITIES

1. The COPA Compliance Officer shall:
 - a. Develop, initiate, maintain and revise policies and procedures for the general operation of the COPA Compliance Program
 - b. Manage day-to-day operation of the COPA Compliance Program
 - c. Establish a compliance plan annually, which shall be presented to, and approved by, the Audit and Compliance Committee of the Ballad Health Board of Directors
 - d. Review any complaint related to compliance with the COPA and Terms of Certification, and, when appropriate, investigate and ascertain the facts
 - i. Recommend corrective action if a violation of the COPA has occurred

- e. If a violation of the COPA is asserted by a Payor, gather the facts
 - i. If there is Noncompliance, make a recommendation to management for corrective action, including, if feasible, any recommendations for a cure, and report such Noncompliance and recommendations to the Audit and Compliance Committee of the Board.
- f. Provide team members of Ballad Health the ability to register complaints related to the COPA and the Terms of Certification.
 - i. Team members shall have the ability to make complaints in an anonymous manner, and the COPA Compliance Office will protect the identity of any such team member.
- g. Prepare a log documenting all complaints (and the resolution, if any, of such complaints) related to the COPA and the Terms of Certification.
 - i. No less than semi-annually, the COPA Compliance Office shall prepare a report containing all complaints, findings, resolutions and open items.
 - 1) Each report shall be simultaneously delivered to the Audit and Compliance Committee of the Board and the COPA Monitor.
- h. Identify potential systemic problems, particularly those related to compliance with the COPA Requirements.
- i. Establish a process for gathering the information needed from the various Ballad Health departments to submit the Quarterly and Annual Reports, as well as any other information required to be submitted to Tennessee and Virginia.
- j. Prepare and submit the COPA Compliance Office Annual Report, which shall include:
 - i. An account of the activities of the Office;
 - ii. Including the number and nature of complaints;
 - iii. Identification of any potential violations of the COPA Requirements; and
 - iv. Other items as identified by the Tennessee Department of Health or by the Local Advisory Council established by the Tennessee Terms of Certification.
 - v. The COPA Compliance Office Annual Report shall be submitted, if not sooner, according to the same time frame applicable to the submission of the Annual Report of Ballad Health.
 - 1) Refer to Section 6.04(b) of the Terms of Certification.
- k. Establish a satellite office in Virginia and provide for access to services of the COPA Compliance Office across the Geographic Service Area.
- l. Prepare a forecast of expenses on an annual basis which supports the functions of the program.

C. REPORTING RESPONSIBILITIES

1. The COPA Compliance Officer will be considered a member of Ballad Health Management and will report jointly to the Executive Chair/President and to the Audit and Compliance Committee of the Ballad Health Board of Directors.
2. The COPA Compliance Officer shall have direct access to the Ballad Health Board of Directors and will make regular reports to the Executive Chair/President and the Audit and Compliance Committee of the Ballad Health Board of Directors on the status of the Ballad Health COPA Compliance Program.
3. The COPA Compliance Office will provide an initial step for resolution of complaints that are believed to relate to the COPA Requirements.
 - a. Complaints related to the COPA Requirements that the COPA Compliance Officer cannot resolve shall be referred to the Audit and Compliance Committee of the Board for direction as to resolution.
4. The COPA Compliance Officer will present to the Executive Chair/President and Audit and Compliance Committee of the Ballad Health Board of Directors in a clear and consistent manner any corrective action plans needed to resolve complaints related to the COPA Requirements.

D. EXTENDED ABSENCE OR VACANCY OF COPA COMPLIANCE OFFICER

1. In the event of an extended absence or vacancy of the COPA Compliance Officer, the Ballad Health Executive Chair/President will appoint, subject to the approval of the Ballad Health Board of Directors and the Tennessee Commissioner of Health, an interim or new COPA Compliance Officer to serve in this role.

Executive Vice President, Chief Operating Officer
Ballad Health

Date

Senior Vice President, COPA Compliance
Ballad Health

Date

**ATTACHMENT 2b - Revised Policy COPA
Compliance Program Description**

POLICY NUMBER: ADM-110-006-BH			
Folder:	Administration/Operational	Effective Date:	April 12, 2018
		Previous Version Date:	NEW
Sub Folder:	Compliance/COPA	Last Reviewed/Revised:	April 12, 2018
COPA COMPLIANCE PROGRAM DESCRIPTION – BALLAD HEALTH			

I. PURPOSE:

To outline guidelines for Ballad Health to comply with the COPA requirements set for by the Tennessee Department of Health (the "Tennessee TOC"), the State Health Commissioner of the Commonwealth of Virginia (the "Virginia Order"), and the Certificate of Public Advantage in Tennessee and the Cooperative Agreement in Virginia.

II. SCOPE:

All team members, Physicians, volunteers, students, independent contractors and vendors

III. FACILITIES/ENTITIES:

Ballad Health Corporate

Tennessee: BRMC, FWCH, HCH, HCMH, HVMC, IPMC, JCCH, JCMC, LMH, SSH, TRH, UCMH, WPH, Kingsport Day Surgery (a separate legal entity managed by Ballad Health), Niswonger Children’s Hospital, New Leaf, Laughlin Healthcare Center, Madison House, Unicoi County Nursing Home, Wellmont Hospice House, Wexford House

Virginia: DCH, JMH, LPH, MVRMC, NCH, RCMC, SCCH, Clearview Psychiatric Unit, Francis Marion Manor Health & Rehabilitation, Green Oak Behavioral Health (Geriatric Behavioral Health Inpatient Program – DCH), Ridgeview Pavilion, Mountain View Regional Medical Center Skilled/Long Term Care Unit, Norton Community Physicians Services (NCPS), Community Home Care (CHC), Abingdon Physician Partners (APP)

Blue Ridge Medical Management Corporation

Bristol Surgery Center, LLC

Holston Valley Imaging Center

Home Health/Hospice

Integrated Solutions Healthcare Network (ISHN)

Laughlin Medical Group (LMG)

Mountain States Pharmacy at Norton Community Hospital

Sleep Services

Takoma Medical Associates

Wellmont Cardiology Services

Wellmont Medical Associates
Wilson Pharmacy, Inc.
WPS Providers, Inc.

IV. DEFINITIONS:

A. **COPA:** Certificate of Public Advantage

V. POLICY:

A. It is the policy of Ballad Health to comply with the requirements set forth in the following:

1. Terms Of Certification Governing the Certificate of Public Advantage Issued to Ballad Health by the Tennessee Department of Health (the "Tennessee TOC");
2. The Order and Letter Authorizing a Cooperative Agreement issued by the State Health Commissioner of the Commonwealth of Virginia (the "Virginia Order"); and
3. The applicable statutes and regulations governing the Certificate of Public Advantage in Tennessee and the Cooperative Agreement in Virginia (collectively referred to as the "COPA Requirements").

B. Accordingly, the Ballad Health Board of Directors and management have adopted this COPA Compliance Program.

VI. Procedure:

A. Ballad Health endeavors to communicate to all personnel the intent to comply with all COPA Requirements through the COPA Compliance Program and the accompanying policies.

B. The COPA Compliance Program will be responsible for the following functions:

1. Educate and train the appropriate Ballad Health team members and Board members on the COPA Requirements according to COPA Education and Training – Ballad Health policy
2. Provide team members of Ballad Health the ability to register complaints related to the COPA Requirements according to COPA Compliance Reporting – Ballad Health policy
3. Review any allegation of non-compliance with the COPA Requirements, and, when appropriate, investigate and ascertain the facts according to COPA Compliance Internal Investigation – Ballad Health policy
4. Establish a process for gathering the information needed from the various Ballad Health departments to submit the Quarterly and Annual Reports, as well as any other information required to be submitted to Tennessee and Virginia under the COPA Requirements, according to COPA Report Submission – Ballad Health policy

5. Ensure information is timely posted on Ballad Health's website as set forth in the COPA Requirements
 6. Establish a satellite office in Virginia and provide for access to services of the COPA Compliance Office across the Geographic Service Area
 7. Subject to the COPA Compliance Policy on COPA Interpretations and Communications with State Officials, manage any communication and interaction related to compliance with the COPA Requirements between Ballad Health and the COPA Monitor, the Tennessee Department of Health, the Tennessee Attorney General's Office, the Local Advisory Council, the Virginia Commissioner of Health, and the Virginia Attorney General's Office
- C. Overall responsibility for operation and oversight of the COPA Compliance Program belongs to the Ballad Health Board of Directors.
1. The day-to-day responsibility for operation and oversight of the COPA Compliance Program rests with the COPA Compliance Officer, who will have direct access to the Ballad Health Board of Directors as described in the COPA Compliance Officer Duties and Responsibilities – Ballad Health.
- D. Ballad Health will communicate changes or modification of the COPA Compliance Program concurrently with such changes or prior to the implementation of such changes or modifications.
1. Ballad Health reserves the right to change, modify, or amend the COPA Compliance Program as deemed necessary by Ballad Health without prior notice.
 - a. Any changes to the compliance program should be consistent with, or otherwise not contradictory to any COPA Requirements.

LINKS:

- COPA Compliance Officer Duties and Responsibilities – Ballad Health, ADM-110-005-BH
- COPA Education and Training – Ballad Health, ADM-110-008-BH
- COPA Compliance Reporting – Ballad Health, ADM-110-007-BH
- COPA Compliance Internal Investigation, ADM-110-004-BH
- COPA Report Submission, ADM-110-009-BH
- COPA Interpretation and Communications with State Officials – Ballad Health, ADM-110-010-BH

 Executive Vice President, Chief Operating Officer
 Ballad Health

 Date

 Senior Vice President, COPA Compliance
 Ballad Health

 Date

**ATTACHMENT 2c - Revised Policy
COPA Interpretation and Communications with State Officials**

POLICY NUMBER: ADM-110-010-BH			
Folder:	Administration / Operational	Effective Date:	April 12, 2018
		Previous Version Date:	NEW
Sub Folder:	Compliance / COPA	Last Reviewed/Revised:	April 12, 2018
COPA INTERPRETATION AND COMMUNICATIONS WITH STATE OFFICIALS – BALLAD HEALTH			

I. PURPOSE:

To outline guidelines for Ballad Health to ensure an efficient flow of communications to and from the State officials tasked with responsibility to supervise the Tennessee TOC and the Virginia Order.

II. SCOPE:

All team members, Physicians, volunteers, students, independent contractors and vendors

III. FACILITIES/ENTITIES:

Ballad Health Corporate

Tennessee: BRMC, FWCH, HCH, HCMH, HVMC, IPMC, JCCH, JCMC, LMH, SSH, TRH, UCMH, WPH, Kingsport Day Surgery (a separate legal entity managed by Ballad Health), Niswonger Children’s Hospital, New Leaf, Laughlin Healthcare Center, Madison House, Unicoi County Nursing Home, Wellmont Hospice House, Wexford House

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Wellmont Medical Associates

Wilson Pharmacy, Inc.

WPS Providers, Inc.

IV. DEFINITIONS:

A. **COPA:** Certificate of Public Advantage

V. POLICY:

- A. It is the policy of Ballad Health to ensure an efficient flow of communications to and from the State officials tasked with responsibility to supervise the following:
1. Terms Of Certification Governing the Certificate of Public Advantage Issued to Ballad Health by the Tennessee Department of Health (the "Tennessee TOC");
 2. The Order and Letter Authorizing a Cooperative Agreement issued by the State Health Commissioner of the Commonwealth of Virginia (the "Virginia Order"); and
 3. The applicable statutes and regulations governing the Certificate of Public Advantage in Tennessee and the Cooperative Agreement in Virginia (collectively referred to as the "COPA Requirements").
 4. An efficient flow of communication ensures information provided to the state is properly vetted for accuracy, and that the state officials may rely upon the information as official submissions from Ballad Health.
 5. An efficient flow of communication from state officials to Ballad Health ensures the information is properly logged and referred to the appropriate individuals within Ballad Health.
- B. All written communications and notices directed to state officials related to COPA Requirements shall be submitted by the General Counsel of Ballad Health or his/her designated counsel, or, as outlined herein, by the COPA Compliance Officer.
1. All communications submitted to the state officials related to COPA Requirements shall be logged, and copied to the COPA Compliance Officer (or to the General Counsel if submitted by the COPA Compliance Officer).
- C. Ballad Health shall notify state officials that all communications related to COPA Requirements should be sent to the General Counsel of Ballad Health, and copied to the COPA Compliance Officer.
1. Any such communications shall be logged by the General Counsel and routed to the appropriate subject matter leader within Ballad Health for review and action, if necessary.
- D. Any written communications submitted to state officials by anyone other than the General Counsel or COPA Compliance Officer, based on the procedures herein, may not be relied upon as official communication by Ballad Health.
1. Any written communication intended to be official by state officials to anyone at Ballad Health other than the General Counsel may not be determined to be officially received by Ballad Health.

2. All notices must comply with §9.01 of the Tennessee TOC.

VI. PROCEDURE:

- A. Questions involving the interpretation or application of provisions and requirements in the Tennessee TOC and the Virginia Order shall be submitted jointly to the COPA Compliance Officer and the General Counsel via email.
 1. Requestors shall include a memo setting out the facts and the issues at question, including the sections of the Tennessee TOC or Virginia Order that the requestor believes to be applicable.
- B. The COPA Compliance Officer and the General Counsel will review each request and will determine an appropriate response, which may include communications with the appropriate state agencies or engagement of outside counsel.
- C. The General Counsel shall have sole authority to engage outside counsel, subject to certain powers reserved to the Ballad Health Board or its officers and committees.
- D. All communications to state agencies involving interpretation of the Tennessee TOC or Virginia Order will be handled either through the General Counsel's Office or the COPA Compliance Office.
 1. The General Counsel will be responsible for correspondence relating to questions about the states' interpretation of their requirements and will copy the COPA Compliance Officer.
 2. The COPA Compliance Officer will be responsible for correspondence relating to the submission of routine materials or information required by the TOC or the Virginia Order with a copy to the General Counsel.
- E. The COPA Compliance Officer and General Counsel will meet with the subject matter leaders within Ballad Health to discuss the issues related to the interpretation.
 1. It may be agreed that the matter may best be resolved through discussion with state officials during a regularly scheduled or special teleconference with the state officials, so that the state officials may understand the context of the issue Ballad Health is seeking clarification of.
 2. In the event such discussion occurs, the General Counsel will be responsible for following up with the state officials to obtain the state's official position on the matter or to document Ballad Health's understanding of the interpretation.
 3. The General Counsel shall document any such interaction, and communicate any result to the subject matter leaders impacted, with copy to the COPA Compliance Officer.
 4. The General Counsel and COPA Compliance Officer will confer regularly and prior to the submission of any required materials or prior to the sending of correspondence relating to the interpretation of the meaning of COPA Requirements.

- F. It is likely that direct communication will occur between various state officials and leaders within Ballad Health, and such communication is appropriate as various collaborations materialize.
 - 1. Requests for such meetings should be channeled through the General Counsel's office.
 - a. The General Counsel will ensure appropriate staff from Ballad Health are notified, the meeting scheduled and the meeting occurrence will be logged.
 - b. The COPA Compliance Officer shall be notified of any meetings scheduled.

- G. It is the policy of Ballad Health to resolve disputes related to interpretation of the COPA Requirements collaboratively internally and with state officials.
 - 1. The COPA Requirements recognize that there may be, at times, disagreement with respect to interpretation.
 - 2. As such, if there is a dispute related to interpretation of the COPA Requirements, and the subject matter leaders do not agree with the interpretation of the General Counsel and COPA Compliance Officer, or the matter is of such substance it could be material for Ballad Health, the matter will be referred to the Chairman/CEO, who will make the internal determination as to Ballad Health's position on the matter.
 - 3. If the Chairman/CEO makes a determination that is not in agreement with the interpretation by state officials, he/she shall notify the Lead Director and Chair of Audit and Compliance.
 - a. The communication of any such decision resulting from such determination will be communicated to the state officials by the General Counsel.
 - 4. In the event there is a disagreement between Ballad Health's interpretation and the interpretation by state officials, the steps outlined in the COPA Requirements shall guide how such dispute is resolved if a dialogue with state officials fails to resolve the matter.
 - 5. Ballad Health shall always endeavor to reach an amicable solution with state officials before articulating to the state a disagreement which may result in either enforcement action, or an administrative dispute under the COPA Requirements or state administrative rules.

- H. Following resolution of any issues involving interpretation of provisions of the TOC or the Virginia Order, the COPA Compliance Officer or General Counsel shall communicate a response by email to the requestor, and such documentation shall be logged by the COPA Compliance Office for future reference.
 - 1. All such communications shall be copied to the COPA Compliance Officer or General Counsel, depending upon which originates the notification.

Executive Vice President, Chief Operating Officer
Ballad Health

Date

Senior Vice President, COPA Compliance,
Ballad Health

Date