

Crossbridge Hospice Compliance & Ethics Program

At Crossbridge Hospice, doing the right thing is at the heart of who we are. Our Compliance & Ethics Program is designed to safeguard the integrity of our services, protect our patients, and uphold the laws and standards that govern healthcare. We work every day to ensure our teams understand expectations, follow regulations, and deliver care with honesty, respect, and integrity.

We comply with all federal and state requirements, including HIPAA, Medicare rules and guidelines, CMS regulatory requirements, DHHS Office of Inspector General (OIG) compliance standards, and the rigorous accreditation standards of the Community Health Accreditation Partner (CHAP). Our program also aligns with the Federal Sentencing Guidelines and is evaluated regularly to ensure continued effectiveness. These laws and expectations shape our internal policies, training, reporting processes, and operational practices.

Every team member, leader, volunteer, and partner plays a role in supporting our culture of ethics and accountability.

The Seven Elements of Our Compliance & Ethics Program

Crossbridge Hospice aligns its program with the OIG's recommended seven elements of an effective Compliance Program.

1. Written Policies & Procedures

At the core of the Crossbridge Hospice Compliance & Ethics Program is a comprehensive set of written policies, procedures, and standards that guide how we conduct business every day. These documents reflect our commitment to providing exceptional, ethical, and compliant care while meeting, and often exceeding regulatory and accreditation expectations.

Code of Conduct

Our Code of Conduct is the foundation of our compliance framework. It defines the behaviors and standards expected of every employee, contractor, volunteer, Board member, and business partner. The Code reinforces our commitment to:

- Preventing fraud, waste, and abuse
- Complying with Medicare program rules, CMS regulations, and state laws
- Protecting HIPAA privacy and the confidentiality of patient information
- Providing high-quality, compassionate hospice care
- Ensuring accuracy in assessment, documentation, billing, and claims
- Identifying and avoiding conflicts of interest
- Maintaining professionalism, respect, and safety in the workplace
- Meeting CHAP accreditation standards for clinical excellence and operational consistency

All individuals associated with Crossbridge Hospice must read, understand, and follow the Code of Conduct. It serves as a practical guide for decision-making, helping employees navigate ethical questions and recognize compliance risk areas in their daily roles.

Policies & Procedures

Crossbridge Hospice maintains a full suite of corporate and service-line policies developed by subject matter experts and reviewed through the Compliance Committee. These policies:

- Incorporate all relevant CMS and Medicare program requirements
- Reflect state and federal regulations specific to hospice care
- Integrate CHAP standards to ensure accreditation readiness
- Provide step-by-step guidance for clinical, operational, billing, and administrative practices
- Outline expectations for documentation, patient care, safety, privacy, and reporting obligations

Policies are reviewed regularly and updated as regulations or organizational needs change. Updates are communicated through internal announcements, newsletters, the learning platform, and departmental education.

Availability & Accountability

Policies are accessible to all covered individuals through our internal communication systems. Every team member is responsible for:

- Understanding the policies and procedures relevant to their job
- Asking questions when guidance is needed
- Applying policies consistently and accurately
- Reporting violations, concerns, or unclear expectations

Any action that deviates from these policies is prohibited and may result in corrective or disciplinary action.

Fraud, Waste & Abuse and Whistleblower Protections

As part of our commitment to transparency, all employees receive information on federal and state fraud and abuse laws—including the False Claims Act—and protections available to whistleblowers. This includes the right to report compliance concerns without fear of retaliation.

2. Compliance Leadership & Oversight

A strong Compliance & Ethics Program requires effective leadership, clear accountability, and meaningful oversight. At Crossbridge Hospice, compliance is supported at every level of the organization, from the Board of Directors to every team member.

Chief Compliance Officer (CCO)

The Chief Compliance Officer oversees the development, implementation, and ongoing management of the Compliance & Ethics Program. The CCO:

- Reports directly to the CEO and Board of Directors
- Leads compliance operations, investigations, audits, monitoring, and risk assessments
- Ensures program alignment with CMS, Medicare, OIG, and CHAP accreditation standards
- Provides guidance to staff and leadership on regulatory requirements and ethical practices
- Has authority to access all parts of the organization and report issues externally if required
- Collaborates with the CEO and CFO to ensure the program has adequate resources, independence, and authority

The CCO does not serve as legal counsel for any company entity, preserving objective program administration.

CEO & Board of Directors

The CEO and Board set the tone for integrity across the organization. Their responsibilities include:

- Providing active oversight of the Compliance & Ethics Program
- Ensuring the CCO had unrestricted access to leadership and governing bodies
- Reviewing compliance reports, risk assessments, and work plan updates
- Supporting a culture of culture where ethics, safety, and accountability are organizational priorities

Compliance Committee

The Compliance Committee is a multidisciplinary team of senior leaders who support the CCO by:

- Reviewing program structure, operations, and risks
- Monitoring audit findings and corrective action plans
- Providing leadership insight into CHAP alignment and regulatory readiness
- Ensuring compliance activities are integrated into daily operations

The committee meets regularly, and key updates are shared with the Board.

3. Training and Education

A strong compliance culture depends on team members who are informed, confident, and equipped to recognize and prevent risk. Crossbridge Hospice provides comprehensive, role-specific compliance education to ensure all covered individuals understand their responsibilities and are empowered to uphold ethical and regulatory standards in every aspect of care.

Comprehensive Training Program

Our training program is designed to meet all CMS/Medicare requirements, CHAP accreditation standards, and OIG/HHS expectations for an effective compliance program. Training is delivered through live instruction, e-learning modules, competency assessments, and ongoing communication.

Training Requirements

All individuals acting on behalf of Crossbridge Hospice, including employees, contracted staff, volunteers, vendors, Board members, and leadership, must complete required compliance education tailored to their role. Training includes:

- **New Hire Compliance Orientation** completed within the first 30 days, introducing the Code of Conduct, reporting methods, privacy expectations, and organizational non-retaliation protections.
- **Annual Compliance Program & Code of Conduct Training** for all covered persons, with updated regulatory and organizational expectations.
- **HIPAA Privacy & Security Training**, including practical safeguards for PHI, mobile device security, and breach prevention.
- **Medicare Fraud, Waste & Abuse (FWA) Training** required under CMS regulations for all staff involved in patient care, documentation, billing, or operational functions.
- **Role-Based High-Risk Topic Training**, such as:
 - Documentation and assessment accuracy
 - Eligibility and recertification standards
 - Billing integrity and claim submissions
 - Clinical quality requirements
 - Safety and emergency preparedness
 - Vendor and referral source compliance
- **CHAP Accreditation Training** to ensure staff understand standards, updates, and compliance expectations tied to survey readiness and ongoing quality improvement.

Purpose & Accountability

Compliance training ensures that every individual understands the federal, state, CMS/Medicare, and CHAP requirements that govern hospice care, as well as their obligations under the Code of Conduct. Through this education, team members learn to recognize compliance risks, understand how to prevent them, and know when and how to escalate concerns appropriately. Training also reinforces each person's responsibility to protect patient rights, confidentiality, and safety. All team members are required to acknowledge the Code of Conduct, disclose any potential conflicts of interest upon hire and annually, report known or suspected concerns through any available reporting method, and ask questions whenever expectations are unclear. Failure to complete required training or to report violations may constitute a breach of policy and the Code of Conduct. To ensure transparency and audit readiness, all training records, acknowledgments, and competency assessments are maintained electronically.

4. Effective Communication & Reporting Channels

Open, honest communication is essential to maintaining a strong compliance culture. Crossbridge Hospice fosters an environment where employees, volunteers, contractors, and stakeholders feel safe asking questions, seeking clarification, and reporting concerns at any time, without hesitation and without fear of retaliation. We believe that early identification of potential issues helps strengthen patient care, protect operational integrity, and maintain full regulatory compliance.

“Speak Up”

Our **Speak Up** initiative reinforces the expectation that every team member plays a vital role in compliance. Individuals are encouraged to reach out immediately whenever something “doesn’t look right”, feels uncertain, or appears inconsistent with Crossbridge Hospice policies, CMS/Medicare regulations, or CHAP standards. No concern is too small to raise.

Compliance Hotline and Reporting Methods

Employees and stakeholders can report concerns or seek compliance guidance through several accessible channels. Crossbridge Hospice provides a confidential, toll-free hotline available 24/7, along with additional reporting methods designed to accommodate personal comfort and communication preferences. A strict non-retaliation policy protects every individual who raises a concern in good faith, meaning no one will face reprisal, punishment, or adverse employment action for speaking up. Any act of retaliation will result in corrective or disciplinary action.

To support open communication, the following reporting channels are available at all times:

- **Speak to a Supervisor or Manager:** ideal for immediate operational or clinical concerns
- **Talk to someone in Human Resources:** for workplace conduct, safety, or behavioral issues
- **Compliance Hotline (24/7):** 1-833-718-5683, managed by an independent third party to support anonymity
- **Email:** compliance@crossbridge-hospice.com
- **Online Reporting Form:** A secure web-based submission method at crossbridgehospice.ethicspoint.com
- **Mobile:** Crossbridgehospicemobile.ethicspoint.com



Reports received through any channel are triaged by the Compliance Department for appropriate investigation, response, and documentation. Anonymous reporters are encouraged to provide sufficient detail to allow meaningful follow-up.

Responsibility to Report

All team members and affiliated partners share responsibility for upholding compliance and operational integrity. They are required to promptly report any observed or suspected unethical, illegal, or unprofessional behavior, including concerns related to:

- Clinical quality or patient safety
- Documentation or billing integrity
- HIPAA/privacy or data security
- Financial misconduct or fraud
- Conflicts of interest
- Code of Conduct or policy violations
- CMS/Medicare or CHAP compliance issues

Any such concerns must be reported to the Compliance Department for review, guidance, and oversight. Failing to report suspected misconduct undermines Crossbridge Hospice's integrity and may constitute a violation of the Code of Conduct. Knowingly filing false or malicious reports is also prohibited and will result in appropriate disciplinary action.

5. Response and Enforcement

Maintaining compliance and fostering a culture of integrity requires consistent enforcement of standards paired with recognition of ethical behavior. Crossbridge Hospice applies fair, transparent, and uniform processes to address misconduct while actively encouraging integrity, accountability, and adherence to regulatory and accreditation requirements.

Consequences for Non-Compliance

Crossbridge Hospice holds all team members, contractors, volunteers, and affiliated partners accountable for adhering to policies, laws, and ethical standards. When a violation occurs, corrective action is taken based on the severity and nature of the issue. Potential actions may include:

- **Coaching or re-education** to reinforce expectations and correct behavior
- **Formal written warnings** documenting the violation and required improvement
- **Suspension or reassignment** for significant or repeated concerns
- **Termination of employment or contracts** in cases of serious or unresolved misconduct
- **Referral to legal or regulatory authorities** when mandated or appropriate

Failing to report known or suspected issues is itself considered a violation of the Code of Conduct, emphasizing the responsibility each individual holds in maintaining organizational integrity.

Positive Reinforcement and Recognition

Crossbridge Hospice also prioritizes acknowledging ethical behavior to foster a positive compliance culture. Team members may be recognized for:

- Consistently making ethical, well-informed decisions
- Maintaining accurate and thorough documentation, billing, and claims integrity
- Demonstrating adherence to CHAP-accredited best practices
- Identifying and implementing process improvements that enhance patient care or operational efficiency
- Promoting safety, integrity, and compliance in daily work

By balancing accountability with positive reinforcement, Crossbridge Hospice ensures a culture that values ethical decision-making, compliance excellence, and continuous improvement, benefiting patients, staff, and the organization as a whole.

6. Risk Assessment, Auditing & Monitoring

Crossbridge Hospice employs structured, proactive processes to identify potential risks, strengthen internal controls, and ensure consistent compliance with all regulatory, accreditation, and ethical standards. By combining risk assessment, auditing, and ongoing monitoring, we maintain operational excellence while safeguarding patient care and organizational integrity.

Risk Assessment

Regular, comprehensive risk assessments allow Crossbridge Hospice to pinpoint vulnerabilities and prioritize actions in areas critical to compliance and quality care. These assessments focus on:

- **Clinical documentation** to ensure accuracy, completeness, and compliance with care standards
- **Billing and coding practices** to prevent errors, fraud, or misuse of Medicare/Medicaid funds
- **Privacy and HIPAA compliance** to protect patient data and confidentiality
- **Operational processes** to identify workflow gaps and potential inefficiencies
- **Regulatory and CHAP standards** to ensure ongoing accreditation readiness and survey compliance
- **Workforce education and communication** to reinforce understanding of policies and reporting obligations

Findings from these risk assessments inform the annual Compliance Work Plan, guiding audit priorities, training initiatives, and process improvements.

Auditing & Monitoring

Crossbridge Hospice implements a robust auditing and monitoring framework to actively detect, prevent, and correct compliance issues. Key activities include:

- **Ongoing monitoring** of high-risk areas to promptly identify potential concerns
- **Formal internal audits** of clinical documentation, billing, and operational processes
- **Targeted reviews** in response to identified risks or emerging regulatory changes
- **CHAP-focused assessments** to support accreditation readiness and continuous quality improvement
- **Follow-up monitoring** to verify that corrective actions are fully implemented and sustained

Audit results and trend analyses are communicated to leadership and integrated into organizational improvement efforts, ensuring that compliance, patient care quality, and operational efficiency continuously evolve.

By combining proactive risk assessment, comprehensive auditing, and strategic monitoring, Crossbridge Hospice maintains a culture of accountability, transparency, and continuous improvement, protecting both patients and the organization while reinforcing ethical and regulatory excellence.

7. Prompt Response and Corrective Action

At Crossbridge Hospice, swift, thorough, and transparent responses to compliance concerns are essential for protecting patient safety, maintaining operational integrity, and reinforcing a culture of ethical behavior. Our approach ensures that identified issues are addressed promptly and effectively to prevent recurrence while supporting continuous improvement.

Investigations

When a potential compliance issue is identified, the Compliance Department initiates a confidential, objective investigation to fully understand the situation. Investigations are designed to:

- **Establish the facts** and determine the nature of the concern
- **Assess the scope and impact** on patients, staff, operations, or regulatory compliance
- **Identify contributing factors or root causes** to prevent similar issues in the future
- **Evaluate potential legal, regulatory, or CHAP implications** to ensure corrective measures align with all requirements

Investigations are conducted with discretion and integrity, ensuring that all parties involved are treated fairly and that evidence is accurately documented.

Corrective Action Plans (CAPs)

Based on the findings of an investigation, Crossbridge Hospice develops tailored Corrective Action Plans to address deficiencies, prevent recurrence, and strengthen compliance. CAPs may include:

- **Policy updates or clarifications** to address gaps or ambiguities
- **Additional training or education** for staff to reinforce expectations and best practices
- **Workflow or process improvements** to enhance efficiency and reduce risk
- **System enhancements** to improve accuracy, accountability, or reporting
- **Disciplinary action**, when appropriate, to uphold standards and accountability
- **Ongoing monitoring** to ensure that corrective measures are fully implemented and effective over time

Commitment to Excellence

Through timely, structured, and effective corrective action, Crossbridge Hospice demonstrates its commitment to patient safety, ethical decision-making, regulatory compliance, and operational excellence. Each response strengthens our culture of accountability, reinforces trust with patients and families, and supports continuous organizational improvement.

Industry Links:

Office of Inspector General, US Department of Health and Human Services:

<https://oig.hhs.gov/compliance/>

Centers for Medicare and Medicaid Services: <https://www.cms.gov>

Medicare Benefit Policy Manual- Chapter 9- Coverage of Hospice

Services: <https://www.cms.gov/regulations-and-guidance/guidance/manuals/downloads/bp102c09.pdf>

Code of Federal Regulations: <https://www.federalregister.gov>

Health Care Compliance Association: <http://www.hcca-info.org>

National Alliance for Care at Home: <http://community.allianceforcareathome.org/home>

American Academy of Hospice and Palliative Medicine: <http://www.aahpm.org>

Hospice Conditions of Participation:

<https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-B/part-418>

CHAP Standards of Excellence: <https://education.chaplinq.org/chap-standards-of-excellence>

Non-Discrimination Statement

Crossbridge Hospice is committed to maintaining a workplace and providing services that are free from discrimination. We strictly prohibit discrimination, harassment, or retaliation of any kind based on race, color, religion, sex, gender identity or expression, sexual orientation, national origin, age, disability, genetic information, marital status, veteran status, or any other characteristic protected by applicable federal, state, or local law.

All employees, patients, clients, and visitors are treated with dignity and respect. Crossbridge Hospice ensures compliance with all relevant laws, including the Civil Rights Act, the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and any other applicable regulations.

Any concerns regarding potential violations of this non-discrimination policy should be reported immediately to the Compliance Officer or Human Resources. Reports will be addressed promptly, confidentially, and without fear of retaliation.