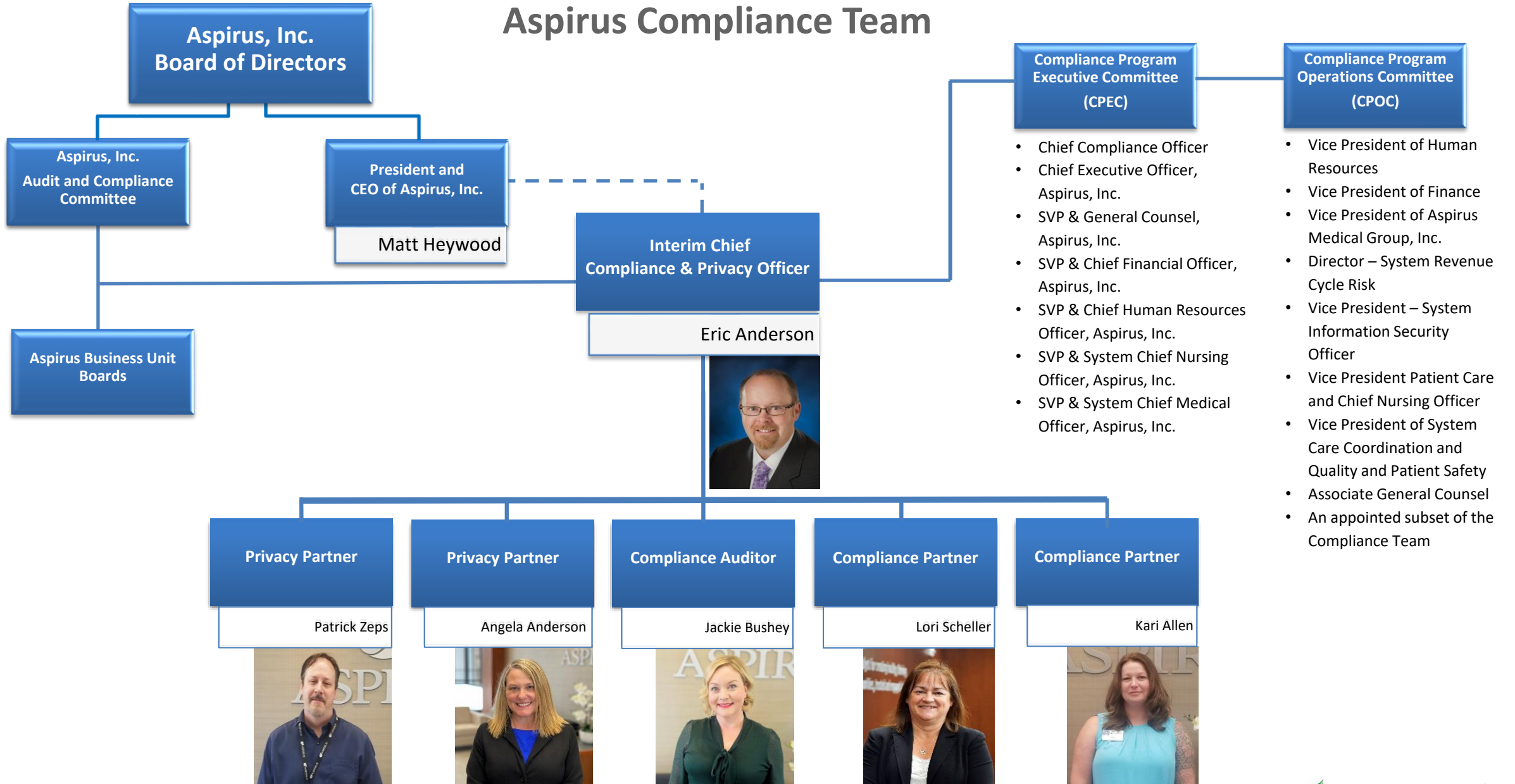


# Aspirus Compliance Team



# The Core Elements of Aspirus' Compliance Program

Seven core elements\* for organizations to implement with the purpose to deter, detect, and prevent fraud, waste and abuse



## Written Policies and Code of Conduct

Put Policies and Code of Conduct in writing and use them as the foundation for the entire program.



## Governance and Compliance Professionals

Delegate an individual or group with operational responsibility, autonomy, and authority.



## Training

Create effective, ongoing training methods.



## Communication

Establish open lines of communication.



## Auditing and Mentoring

Use internal tools to evaluate program effectiveness and detect criminal conduct.



## Investigations

Encourage employees to raise concerns and have investigative procedures in place. Resolve identified problems promptly and add related issues to monitoring activities.



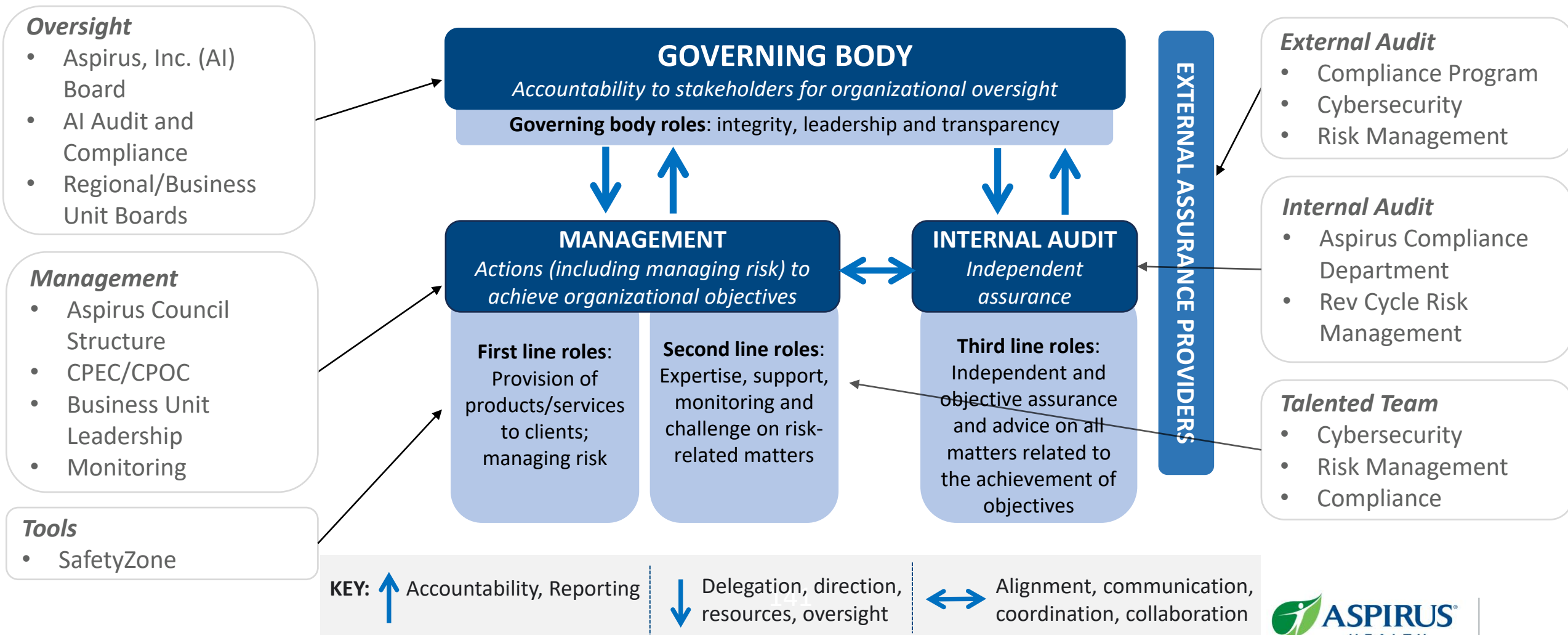
## Enforcement of Standards

Establish appropriate incentives for compliance and disciplinary actions for violations.

*\*As identified by the Office of Inspector General (OIG)*

# Embodying the “Three Lines of Defense” (3LOD)

How Aspirus enacts this strategy to protect the care and business of providing that care across the system



“3LOD” Published by the Institute of Internal Auditors (IIA)

