



# Med Center Health

## **Compliance Training**

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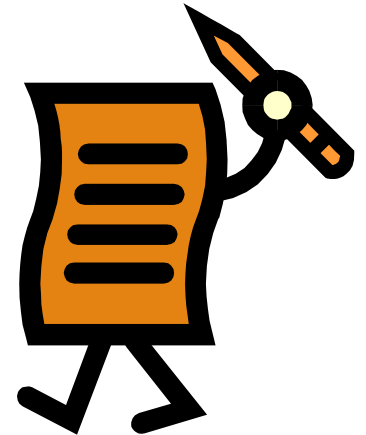
our choice is to do the right thing



# Elements of Our Compliance Program include ...

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- ❖ A written Code of Conduct;
- ❖ Education and Training;
- ❖ Compliance Officer;
- ❖ Monitoring and Auditing CHC's Compliance;
- ❖ A Process to Receive Complaints;
- ❖ A System to Investigate Problems; and
- ❖ A System to Respond to Allegations

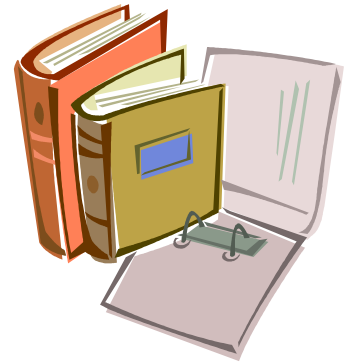


# Code of Conduct

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The Code of Conduct provides guidance on:

- ❖ Quality of Care;
- ❖ Privacy and Confidentiality;
- ❖ Conflicts of Interest
- ❖ Culture of Dignity and Respect
- ❖ Environmental Safety
- ❖ Compliance with Laws and Regulations; and
- ❖ Therapeutic Boundaries
- ❖ Safeguarding Property and Interests



# Code of Conduct

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The Code of Conduct is distributed to board members, employees, physicians, volunteers, and students. All of us have agreed to follow the Code of Conduct which states:

“I understand I have a responsibility to do my part in preventing and reporting illegal, unethical, unsafe, or non-compliant activities to my supervisor, upper management, Human Resources, the Corporate Compliance Officer or the Compliance Hotline (1-844-988-1696).”



# Education and Training

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- ❖ Med Center Health works to ensure that our employees are well-trained and capable of dealing with our patient's concerns:
- ❖ You are being provided with Pre-Hire Training
- ❖ Once you start your new roles, your leaders will provide you with additional training courses and will work with you to ensure you have the time to complete them timely.
- ❖ You may be provided with supplemental training courses, which may be specific to your role or may be a course the organization feels is important for all employees
- ❖ We also require annual training of all our employees to ensure skills and knowledge are kept up to date



# Compliance with State and Federal Statutes and Regulations

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Med Center Health is committed to complying with laws, regulations and standards that govern our operations as a health care provider.

## ❖ The False Claims Act (FCA)

- The Purpose of the FCA is to combat fraud, waste, and abuse with regard to federal healthcare programs. The FCA is a felony that makes it illegal to knowingly file a false or fraudulent claim for payment with Medicare, Medicaid, or other federally funded programs
- “Knowingly” can mean the person or organization acted with actual knowledge, deliberate ignorance, or in reckless disregard to the truth

## ❖ The Civil Monetary Penalties Law (CMPL)

- The CMPL establishes additional civil penalties, assessments, and exclusions separate from the FCA

## ❖ Kentucky Fraud and Abuse Laws

- Also establishes additional per claim monetary penalties and allows for exclusion from State programs



# The Risks of Noncompliance

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- ❖ Monetary penalties/Civil settlements
- ❖ Mandated compliance programs (through corporate integrity agreements with the government)
- ❖ Exclusions from government-sponsored programs, such as Medicare and Medicaid
- ❖ Criminal prosecution and incarceration
- ❖ Damage to our reputation



# Compliance Monitoring

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The Compliance Officer works throughout Med Center Health to perform internal monitoring and audits:

- ❖ The Compliance Officer routinely performs rounding at all of our sites and speaks with employees about their concerns
- ❖ Compliance also works with our internal auditing firm, Dean Dorton, to perform quarterly and ad hoc audits on a variety of areas throughout the year
  - These audits are determined based on government guidance, concerns from employees, and from an annual risk assessment conducted with leaders across Med Center Health
- ❖ Compliance also conducts reviews and investigations on reported issues and works with all levels of employees to address these concerns





# What to Report

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Issues that should be reported include:

- Breach of confidentiality;
- Unethical relationships with vendors or contractors;
- Fraudulent or false actions;
- Improper billing practices;
- Unethical staff behavior;
- Unethical/inappropriate care of patients;
- Bribes or kickbacks; and
- Stealing CHC property, such as equipment.



# How to Report Compliance Violations

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Open communication helps MCH better identify and respond to compliance problems early while there is still time to rectify the situation internally.

If you see something that seems to violate the law, or policies and procedures, you should take the following steps:

- Report the problem to administration
- Report the problem to the Corporate Compliance Officer



# If You Wish to Report Anonymously

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- ❖ If you feel uncomfortable talking to your supervisor, other management personnel or the Compliance Officer, or call the confidential **“Compliance Hotline” at 1-844-988-1696**. It is available 24 hours a day, seven days a week.
- ❖ The Compliance Hotline is operated by a separate company, unrelated to MCH.
- ❖ Calls to the Compliance Hotline are received by trained, external staff. They document and forward details of your call to the MCH compliance officer. A case number is assigned to the complaint to maintain anonymity.



# Who is our Compliance Officer?

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Joseph Newton is our Corporate Compliance Officer

He is a licensed attorney, certified in Healthcare Compliance, and a Certified Fraud Examiner

He oversees the Administrative Compliance Committee, which includes leaders from across the organization. This committee meets quarterly to discuss the successes and concerns of our compliance program

He can be reached by email at [NewtJM01@MCHHealth.net](mailto:NewtJM01@MCHHealth.net) or by phone at (270) 796-6553



# Code of Conduct

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The CHC Code of Conduct is your guide to corporate integrity and is available on the shared drive for your review at:

<S:\CHC Policies & Procedures\Compliance & HIPAA\Corporate Compliance>

You will also receive a hard copy of the Code of Conduct at New Employee Orientation



# Code of Conduct Acknowledgement

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I acknowledge receiving Code of Conduct and Compliance training. I have been given a copy of the Code of Conduct and am familiar with its content. I understand that I have a responsibility to do my part in preventing and reporting activities that are illegal, unethical, a breach of privacy or confidentiality, non-compliant, or unsafe to my supervisor, upper management, the Compliance and Privacy Officer, or the Compliance Hotline at 1-844-988-1696.



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