

Compliance and Integrity Education



Healthcare Laws and
Governmental Healthcare Regulations





Acting with Integrity

Code of Conduct

[S:\Public\Compliance Education\Audio conference- PowerPoints\Cracking the Code no brand.mp4](#)

Describes Expected Actions and Behaviors

Do the Right Thing

Follow Compliance and HIPAA Policies

ComplianceWhy should you care?

PROTECTION of

● Ethical Business Conduct

- Honest and fair in all the transactions
- Asset Protection (funds & environment)
- Documentation integrity

● Patient Rights

- Privacy - HIPAA
- Access for all (poor and underserved) -EMTALA
- Anti-discrimination
includes Language Assistance & Gender Identity
- Quality Care & Safety -Protection from Adverse events

ETHICAL BUSINESS CONDUCT

Financial assets protection

- Avoidance of Fraud, Waste and Abuse
- Log and review for comprehensive documentation
- Avoid potential conflicts of interest
 - Gifts, gratuities, and discounts; Tax-exempt status; Fundraising & marketing; Anti-trust; Contracts
- Protect proprietary information and database information

Physical asset protection

- Guard assets from theft or misuse
- Proper care of item or use of resources
- Support positive environmental impact



Intellectual property protection

- Protect CH database of information
- Promptly report suspicious emails



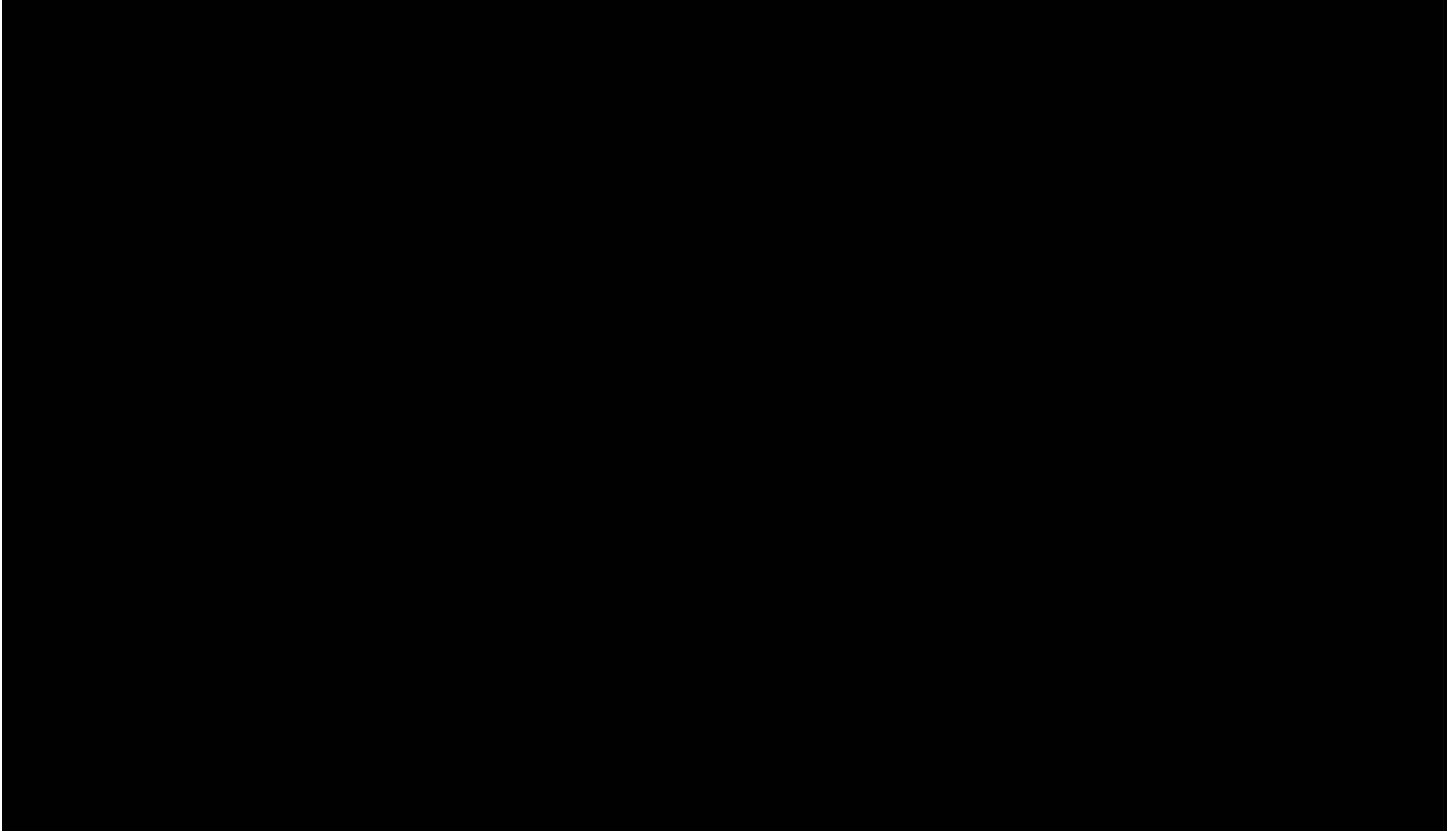
Fraud, Waste, & Abuse Resource Management

Complete, Accurate, Timely Documentation Supports:

high quality patient care
medical necessity
coding determination
claims for service (billing)



Follow documentation maintenance requirements
and correct disposal of documents.



Gloria and Juan placing order for a CBC blood test

Question- What Should You Do?



I'm not certain,
but I think
someone is
documenting
things that
weren't done.

This could be a serious issue. Suspected inaccurate, incomplete, or false documentation needs to be reported as soon as possible.

Reported Non-Compliance Concerns

- Every report is investigated and logged
- The Non-Retaliation policy protects those who report
- Compliance is everyone's responsibility
- Management might not know



Protecting CH Proprietary and Database Information

- Malware
- Ransomware
- Phishing



All Catholic Health associates will have an CH email address.

E-mail PHISH

All emails from external sources will display this banner. Be aware that something is suspicious if the sender is within Catholic Health.



Attention: This email came from an unexpected emails. external source. Do not open attachments or click on links from unknown senders or

From: Mark Sullivan [mailto:ceo.admnng@aol.com]
Sent: Monday, November 12, 2018 12:26 PM
To: [REDACTED]
Subject: Re: Request

The email address is not a CHS email

It tries to instill a sense of urgency

I'm in-between something right now and something came to my thoughts, I do not think we have done too much than projected yearly spend on incentives, no question a couple of our staff have been outstanding this year including you, a little kind gesture would not be bad to appreciate all staffs for a job well done, how about we share a couple of gift cards **today** to appreciate our staffs. I will like you to get me 10 pieces of physical Amazon gift cards of \$100 value on each amounting to \$1000 in total, and \$500 each of [hotels.com](https://www.hotels.com) gift card (8 pieces) amounting to \$4000 total, before the year runs out we'd sign up with Amazon business gift card for distribution as rewards and incentives, This will be distributed fairly on all levels of management, **don't mention it to anyone.** Advice if this can be done within an hour. Please confirm your phone number so i can text you to correspond better on this

It tries to keep the user from telling anyone else.

Find the Phish



From: Human Resources <human.resources@chsbuffalo.com>
Sent: Tuesday, January 15, 2019 3:30 PM
To: Bradford, Nancy
Subject: 2019 Updated Sick Time Policy

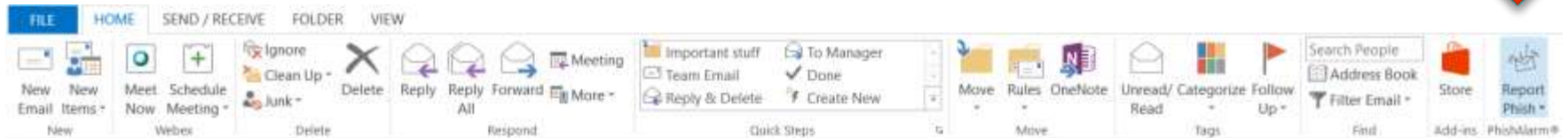
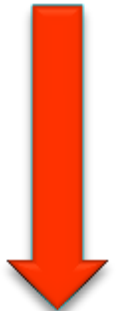
Attention: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Nancy,

Please find attached, our updated vacation and sick time policy for 2019. If you have any questions, please see your manager.

Sincerely,
Catholic Health System HR

[2019UpdatedSickTimePolicy](#)



Protection of Patient Rights

Speak Up™ For Your Rights

a new patient safety campaign
from The Joint Commission,
focuses on patients' rights

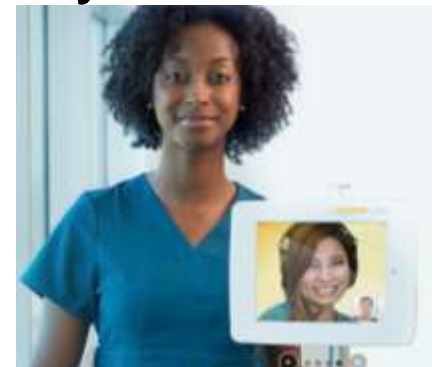




Language Assistance includes Sign Language

Can you use family interpreters?

- Regulations state the CH approved vendor service must be offered and utilized to decline. Documentation is critical.
- Discouraged because:
 - Uncertain of qualification of proficiency
 - May not know medical terminology
 - Not bound to HIPAA



Scenario- A patient states that they are hearing impaired but seems to be understanding the communication



Do you still have to offer the language assistance service?

Gender Identity Protection

How does this affect you?

- AS A RESULT OF THESE CHANGES, THE OUTPUT OF WRISTBANDS AND CHART LABELS WILL APPEAR SLIGHTLY DIFFERENT
- THERE IS NOW A FIELD (HIGHLIGHTED IN YELLOW) TO INDICATE "PREFERRED NAME" AND "GENDER IDENTITY"
- OUT OF RESPECT FOR THE PATIENT, IF A "PREFERRED NAME" IS PRESENT IT IS TO BE USED IN COMMUNICATION WITH OR ABOUT THE PATIENT - THIS SHOULD NOT BE USED FOR PATIENT IDENTIFICATION



Examples...

TEST, GREEN
01/01/1957 M AGE: 62Y
ECD: 20002151650 MR: 52511479

← Master label

TEST, GREEN
01/01/1957 M AGE: 62Y
Suzie QID: MTF
MR: 52511479
ECD: 20002151650

← Chart label

TEST, GREEN
01/01/1957 M AGE: 62Y WB
Suzie QID: MTF SOC
MR: 52511479
ECD: 20002151650

← Wristband

Gender Identification:

Nonbinary/Another

FTM - Female to Male

MTF - Male to Female

Catholic Health Pursuing Excellence Expectations

**Pay Attention to Details *Communicate Clearly & Directly & Perform Effective Handoffs*

Privacy- HIPAA

Protected Health Information (PHI)

When are you allowed to

- Access
- Acquisition
- Use
- Disclosure PHI?



Is it part of your job duties
or responsibilities?

Scenario

Accessing CH Database

Associate: I've been waiting forever for my lab test results.



I know, I'll look up the results in the CH database

**All computer use is monitored.
This is a violation of CH policy**

Confidentiality & Social Media

- Carefully consider what you post on social media
- Representation, or speaking on behalf of, Catholic Health on any social media site is subject to approval
- Do not disclose patient, confidential or proprietary information on Social Media
- CAUTION with photographs taken on Catholic Health property

See CH Social Media Policy



Scenario - Texting

Pre-natal clinic nurse just saw the girlfriend of nurse's ex-boyfriend



Hey John,
I just saw the
new girlfriend.
I guess
congratulations
are due!

**This is a HIPAA violation and
can result in termination of employment**

Scenario- Inquiring

You just found out that your best friend, another CH associate, called in sick.

On your way to the cafeteria you see your friend waiting in x-ray with her back to you.



Question: Do you go up and greet her and ask her what happened?

This is a violation of HIPAA and associate rights

Scenario- Posting to Social Media

Photos on Catholic Health Property



An associate received flowers at work
from a patient's family member
and posts a picture on Facebook.

What is the concern?

**This violates HIPAA, associate rights,
and possibly the Gift policy**

Your Compliance Duties

PREVENTION

Actively engage in attaining high quality
Review applicable Policies & Procedures
Complete mandatory education and any
other assigned education



IDENTIFY & REPORT

Identify-Look, listen, and speak up
Report suspected non-compliance
activities ASAP



MITIGATE & RESOLVE

Support non-retaliation policy



Examples of Suspected Non-Compliance Concerns to Report

- **Fraud, Waste, or Abuse**

Documentation integrity concerns

- **Violation of a Patient's Rights**

Confidentiality/Discrimination

- **Misuse of the assets/resources**

- **Conflicts of Interest**

Inappropriate gifts, entertainment or gratuities

- **Dishonest communication /Lack of integrity**

- **Retaliation**

For reporting a compliance concern



Reporting Compliance Concerns

Immediate supervisor or appropriate department



Higher level manager



**Chief Compliance Officer
Leonardo Sette-Camara, Esq.
716-821-4469**



**Compliance Hotline 1-888-200-5380 (available 24/7)
HIPAA Hotline 862-1790, IT Security Analyst 862-1938
Confidential. Anonymous (if desired)
ComplianceOffice@chsbuffalo.org**