



Corporate Compliance & Integrity

REPORTING OF CONCERNS

Should report concerns to:

- Your Instructor
- The Department Manager
- The Department Director
- The CC&I Department:

Craig White, 725-5046

Ricardo Lizarribar, 725-5212

You may also use:

- The CC&I **HelpLine, (888) 398-2633**
- The HIPAA **HelpLine, 725-5012**

Conflicts of Interest

Team Members and affiliates should avoid **Conflicts of Interest** and may not:

- Use SRH assets for **personal benefit** or **personal business**.
- Have business relationships affecting or affected by SRH's business

Potential conflicts must be reported and approved

- *Administrative Team*, LDI members, and Hospital and Foundation *Board of Trustee* members complete **annual statements**.

Business Courtesies

Should never be:

- **accepted, offered** or **provided** as an inducement to reward business or refer patients.
- **solicited** by or from a **potential referral source**.

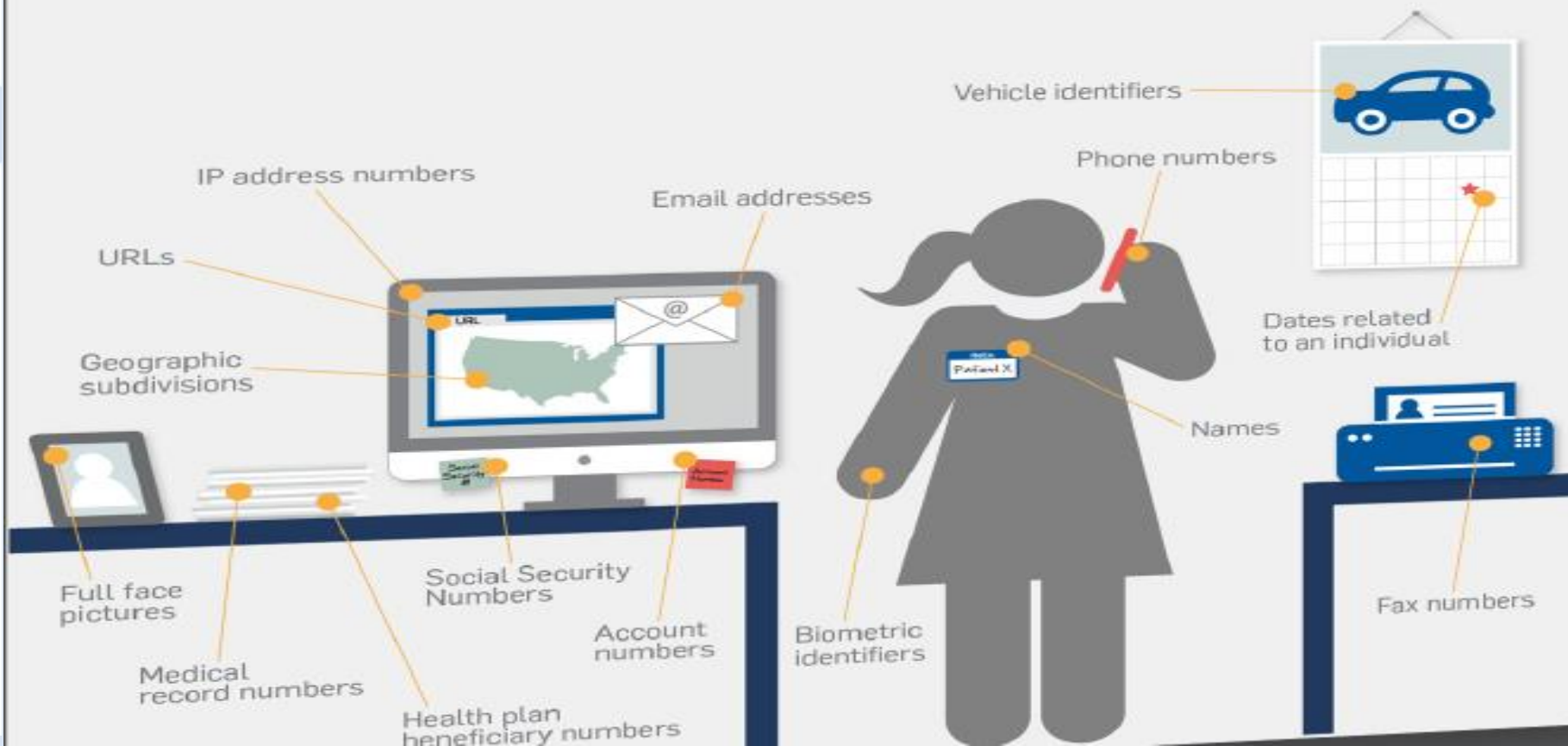
Team Members may only accept courtesies of nominal value (<\$25)

All physician courtesies must have prior approval from CC&I

Protected Health Information



PHI is anything that identifies an individual used for healthcare purposes.



Patient Confidentiality

HIPAA regulations allow us to access/use/disclose PHI for Treatment, Payment, Hospital Operations, if Required by Law, or if requested by the patient.

- all other reasons require specific patient permission
- if a law requires release (pt. abuse, infectious disease etc.), patient permission isn't required
- patient requests must be documented

Minimum Necessary



Identity Verification



PATIENT RIGHTS

- How Communicated
- Request Amendment
- Request Restriction

Don't Overthink It!



Data Security

- If you are provided with a phone, computer, etc. you are responsible for securing it
 - Do not leave equipment in your car
- **Never** e-mail anything confidential to your personal e-mail
- **Do not text** confidential information

Data Security

- If you lose a phone or computer, report it **immediately**
- **No** laptop or phone should be used without a user name and password
- Laptops and phones should be **encrypted** prior to taking them offsite
- **Never** share user names and passwords

Social Networking

Electronic Public Displays of **PHI** without Patient Authorization are prohibited:

- posting of photographs, video or any information about a SRH/SMG patient
- including, but not limited to, social networking sites; blogs; pinning; pinging; and tweeting.

Day-To-Day Scenarios

- **Discussing PHI**

- Environmental awareness
- Tailor your method and manner
- Patient's assent in front of others

DO'S & DON'TS



- **Social Media**

- Posting work details/ insensitive material

- **Friends, Family, Foes, Famous...etc.**

- Professionalism and respect over curiosity!

- **Professional Judgement**

- In the backdrop of any situation

Environment of Care

We are committed to providing a safe and healthy environment for all **patients** and **Team Members**.

Use of **illegal drugs, alcohol** or **tobacco** is not allowed on any SRH property.

Team Members have a legal and ethical responsibility to maintain control over **prescription drugs, controlled substances and medical supplies**.

Team Member Relations

- SRH is an **Equal Opportunity Employer** and committed to a harassment-free workplace free from, intimidation, threats, and physical or verbal abuse.
- **Harassment in any form will not be tolerated.**

If you feel that you or someone else is being harassed, **please report it.**

Safeguarding Property

Physical, Financial, Intellectual and **Electronic Property** owned by SRH are essential to business.

Theft, Embezzlement or **Financial Misconduct** involving hospital property will not be tolerated.

Fraud, Waste & Abuse

The **False Claims Act** addresses and enforces the submittal of improper documentation for payment of healthcare services.

All Team Members must properly **Bill, Charge** and **Code** for services provided.

Billing for services not **documented** or **provided** could be a **“False Claim”**.

Fraud, Waste & Abuse

All **Documents, Financial Reports** or **Records** must be filled out in a clear manner.

False or **misleading** statements or wording is not allowed.

Signatures that can't be read must have a **printed name** below.

Fraud, Waste & Abuse

The **False Claims Act** also provides protections for anyone who wishes to confidentially report suspected fraud.

Reference the SRH **Prevention, Detection and Reporting of Fraud, Waste and Abuse** policy for more details.

Summary

We all want to be in an organization that is **ethical** and in full compliance with all applicable laws.

Each of us has the responsibility to perform our own jobs **legally and ethically** and to **report** any suspected or actual ethical or legal violations.