System Office New Hire Orientation

Integrity & Compliance Program

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## The context for ‘the sacred work’ we do

<table>
<thead>
<tr>
<th>Mission</th>
<th>We, Trinity Health, serve together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities.</th>
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<tbody>
<tr>
<td>Vision</td>
<td>As a mission-driven innovative health organization, we will become the national leader in improving the health of our communities and each person we serve. We will be the most trusted health partner for life.</td>
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<td>Core Values</td>
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<td>Reverence</td>
<td>We honor the sacredness and dignity of every person.</td>
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<td>Commitment to Those Who are Poor</td>
<td>We stand with and serve those who are poor, especially those most vulnerable.</td>
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<td>Justice</td>
<td>We foster right relationships to promote the common good, including sustainability of Earth.</td>
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<td>Stewardship</td>
<td>We honor our heritage and hold ourselves accountable for the human, financial and natural resources entrusted to our care.</td>
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<tr>
<td>Integrity</td>
<td>We are faithful to who we say we are.</td>
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Working in health care is complex

- Sometimes right course of action is unclear
- Examples at System Office:
  - My doctor is out of town and I need information from my medical record. Can I use my work access to look it up?
  - Medicare notified us of billing inaccuracies. The bills were fixed. But we haven’t changed our system. What’s my responsibility?
  - I overheard a coworker making jokes about the elderly with other coworkers. What should I do?
  - A physician I support doesn’t speak to my team professionally. Are physicians held to our respectful workplace standards?
  - Is it okay if I let a supplier buy lunch for our department a few times a month?
The purpose of today’s introduction

- Introduce the Integrity & Compliance Program
- Discuss your responsibilities

Speak up/ ask questions

Escalate issues

Read and follow the Code of Conduct

Complete training

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What is the Integrity and Compliance Program?

• Trinity Health’s commitment to:
  - act with integrity
  - make decisions based on highest standards of ethical behavior
  - follow all laws and regulations

• Key Integrity and Compliance Program resources:
The themes of the Code of Conduct

• Expected **behaviors and conduct of:**
  - Colleagues, volunteers and contractors
  - Medical staff
  - Board members
  - Suppliers and other business partners

• Commitment to maintaining “**right relationships**” with:
  - Our patients/residents and their families
  - Co-workers and others serving with us
  - Suppliers and other business partners
  - Government and others that pay for our services
  - Our communities
Key topics covered in the Code of Conduct

- Fraud and Abuse
- Conflicts of Interest
- Privacy and Confidentiality
- Respectful Work Environment
- Reporting Issues and Concerns
Some key points about fraud and abuse

• **What is fraud?**
  - An intentional act of deception or misrepresentation
  - Acting with actual knowledge or in “reckless disregard” of the laws or regulations

• **What is abuse?**
  - Improper or excessive use of a program or service

• **Examples in health care:**
  - Falsifying medical records
  - Submitting inaccurate or misleading claims for services
  - Submitting claims for services never provided
  - Submitting claims that don’t meet payer requirements
  - Lying to obtain payment for services
  - Offering or paying money, goods, or anything of value for patient referrals
  - Offering or giving something of value to patients to encourage them to use or purchase health care services
What’s expected of you with fraud and abuse?

<table>
<thead>
<tr>
<th><strong>Act with honesty and integrity</strong></th>
<th>• in all Trinity Health activities.</th>
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</thead>
<tbody>
<tr>
<td><strong>Follow all laws and regulations</strong></td>
<td>• that apply to your work and ask for assistance if you have questions.</td>
</tr>
<tr>
<td><strong>Follow all government requirements</strong> (e.g., Medicare and Medicaid)</td>
<td>• and other third-party payers that pay for health care services.</td>
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<td><strong>Participate in training and education</strong></td>
<td>• on laws and regulations that apply to your work responsibilities.</td>
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<tr>
<td><strong>Cooperate with any government investigation.</strong></td>
<td>• Never destroy or alter documents or make false statements in a government investigation.</td>
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Some key points about the False Claims Act

• Federal law that makes it a crime to knowingly falsify a record or file a false claim involving federal health care programs (e.g., Medicare, Medicaid)
• Many states with Trinity Health operations have similar false claim laws
• Refer to the False Claims Act information in the Code of Conduct for more information on:

  - Penalties for violating the False Claims Act
  - Protections for individuals who file a lawsuit under the False Claims Act

Scenario: You believe services are being billed incorrectly. What should you do?
Defining Conflicts of Interest

• **What is a Conflict of Interest?**
  - Outside activities/relationships that influence - or could appear to influence - decisions

• **Examples**
  - Accepting gifts, entertainment, meals, sporting event tickets, etc., from suppliers
  - Having a financial interest (e.g., employment, compensation arrangement, ownership) in companies doing business with us
  - Using confidential business information for personal gain
  - Accepting outside employment with a company that competes with Trinity Health
What’s expected of you with Conflicts of Interest?

- Stay objective and avoid Conflicts of Interests
- Disclose, and get advance approval from your supervisor for situations that could represent a potential Conflict of Interest
- Make decisions in the best interest of our patients and our organization

**Scenario:** If a supplier offers to buy lunch for your department, what should you do?
Some key points about Privacy & Security

• **Right Relationships with Patients:** Respect for, and protection of, patient information is CRUCIAL for maintaining trust.

• Patient information (a.k.a. *Protected Heath Information* or PHI) **not just patient names**—any information, used alone or in combination, that could identify a patient.

• Trinity Health **collects PHI** from patients, residents and others in our care in order **to provide effective, high-quality care**.

• PHI can be in **many forms**—electronic, paper, films and digital images, even verbal conversations!
Examples of mishandled patient information

- Patient information in public trash dump reported on news
- Patient’s HIV information disclosed; child shunned
- Mental health report left at copier and included in wrong mailing
- Identifiable patient information used in community education
- Wrong fax number; information on 100 patients sent to day care
- Colleague discloses patient information on Facebook
- Nurse discusses pregnancy test while visitors present
- Colleague sees friend on surgery list; asks spouse about surgery
- Patient receives another patient’s discharge orders
Guidelines for accessing patient information

• Do not use, access or disclose patient information unless for a legitimate business or clinical purpose
• PHI systems are monitored
• Consequences of inappropriate access:
  • Disciplinary action up to and including termination of employment
  • Potential civil monetary fines or jail time if intentional and for personal gain

Scenario: A co-worker tells you she looked up your supervisor's birthday in the billing system. What should you do?
Safeguarding Patient Information – Verbal

- Don’t discuss with family, friends or others
- Don’t talk about patients in public spaces
- Don’t discuss patients on social media sites such as Facebook™ or Twitter™

Scenario: A coworker is a Facebook friend, and shares information about a Trinity Health patient that’s being reported by a local TV station. What should you do?
Safeguarding Patient Information – Electronic

• Keep all passwords **confidential**
  - Don’t share passwords
  - Keep passwords secure

• Use system access codes/security badges appropriately
  - Use access codes only for work
  - Don’t share access codes/badge
  - Secure office doors and work areas
  - Do not let outsiders into building/department with your access code/badge

• Keep PHI secure
  - Encrypt external emails
  - Lock up laptops, mobile devices, reports and other materials containing patient information
  - When in transport, secure items and materials in car trunk
  - Do not save patient information on portable USB devices and CDs/DVDs
Safeguarding Patient Information – Other

- Verify fax numbers, mail and interoffice addresses
- Be responsible for documents you print or copy
- Use the “print locked copy” feature when printing patient information
- Shred documents containing patient information

Scenario: You find documents left at the copier containing patient information. What should you do?
Privacy and Security – Summary

• Be accountable for protecting privacy/security of patient information at work
• Notify supervisor immediately about lost, stolen or unprotected patient information
• Review any additional privacy and security procedures that may be applicable to your department with your supervisor
• Complete the annual Integrity & Compliance HealthStream course assigned to you
• Review policies online
• Ask if you have any questions!
Resources to Answer Your Questions

Many resources are available to assist in answering your questions or to report an issue or concern:

- Your supervisor or manager
- Higher-level manager or leader
- Human Resources
- Your Integrity and Compliance Officer
- Privacy and Security Officials
- Trinity Health Integrity & Compliance Line
It’s your obligation to speak up!

- Seek answers and report issues and concerns
- Right and duty to report

**Trinity Health Non-Retaliation Policy**

- Trinity Health policy prohibits retaliation, in any form, against individuals who report issues and concerns in good faith
- Retaliation is subject to discipline, up to and including termination of employment
Integrity & Compliance Officers

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Preston Jennings
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• Staffed 24/7/365 by an outside service
• Staff trained to listen/gather information
• Online reporting: www.mycompliancereport.com, ID “THO”
• Callers may be anonymous; all reports confidential
• Calls not traced or recorded; no caller ID
• Investigations and responses within 30 days
Thank You!

“We are all accountable”

Remember your responsibility to:

Speak up/ask questions  
Escalate issues  
Read and follow the Code of Conduct  
Complete training