

Corporate Compliance



2023 Mandatory Education



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Training Objectives

To ensure Mohawk Valley Health System (MVHS) employees understand:


- The organization's corporate culture of maintaining ethical business practices and compliance with laws and regulations that govern health care.
- The importance and obligation to consistently adhere to the laws, regulations, and policies that govern health care.
- How to prevent situations that may put the organization at risk both legally and financially.
- How to report suspected violations of federal and state laws and regulations, and suspected violations of internal policies and procedures that govern our health care system.




What is Corporate Compliance?



- It is about the prevention, detection, collaboration and enforcement of all applicable laws and regulations while conducting business.



- Creates a culture that encourages ethical conduct and a commitment to compliance with the law.
- Emphasizes the importance of acting with Integrity and making ethical decisions.

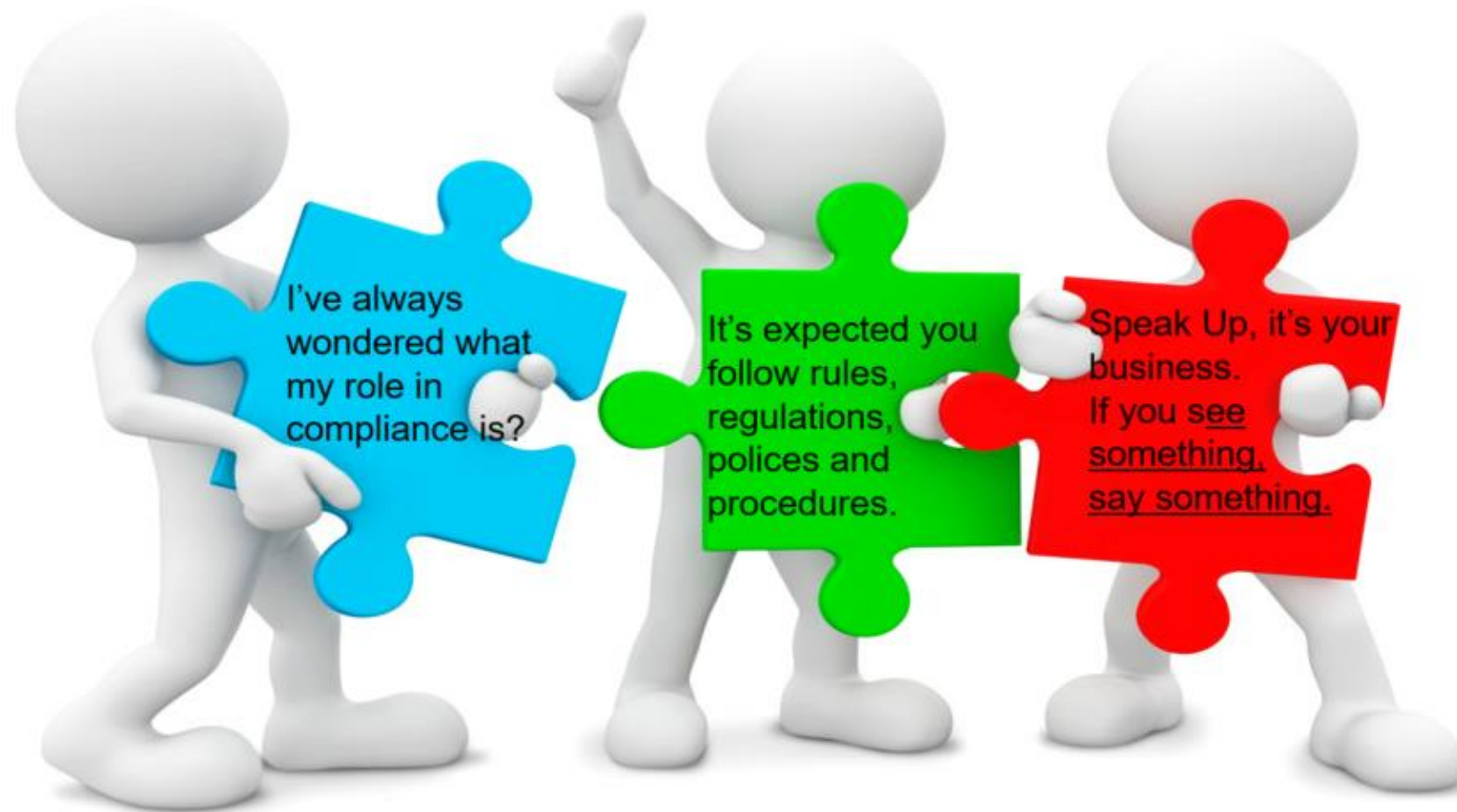


- Compliance encourages issues to be reported and resolved.



- Compliance is a mechanism for constant monitoring of MVHS systems.

What's my role in Compliance?

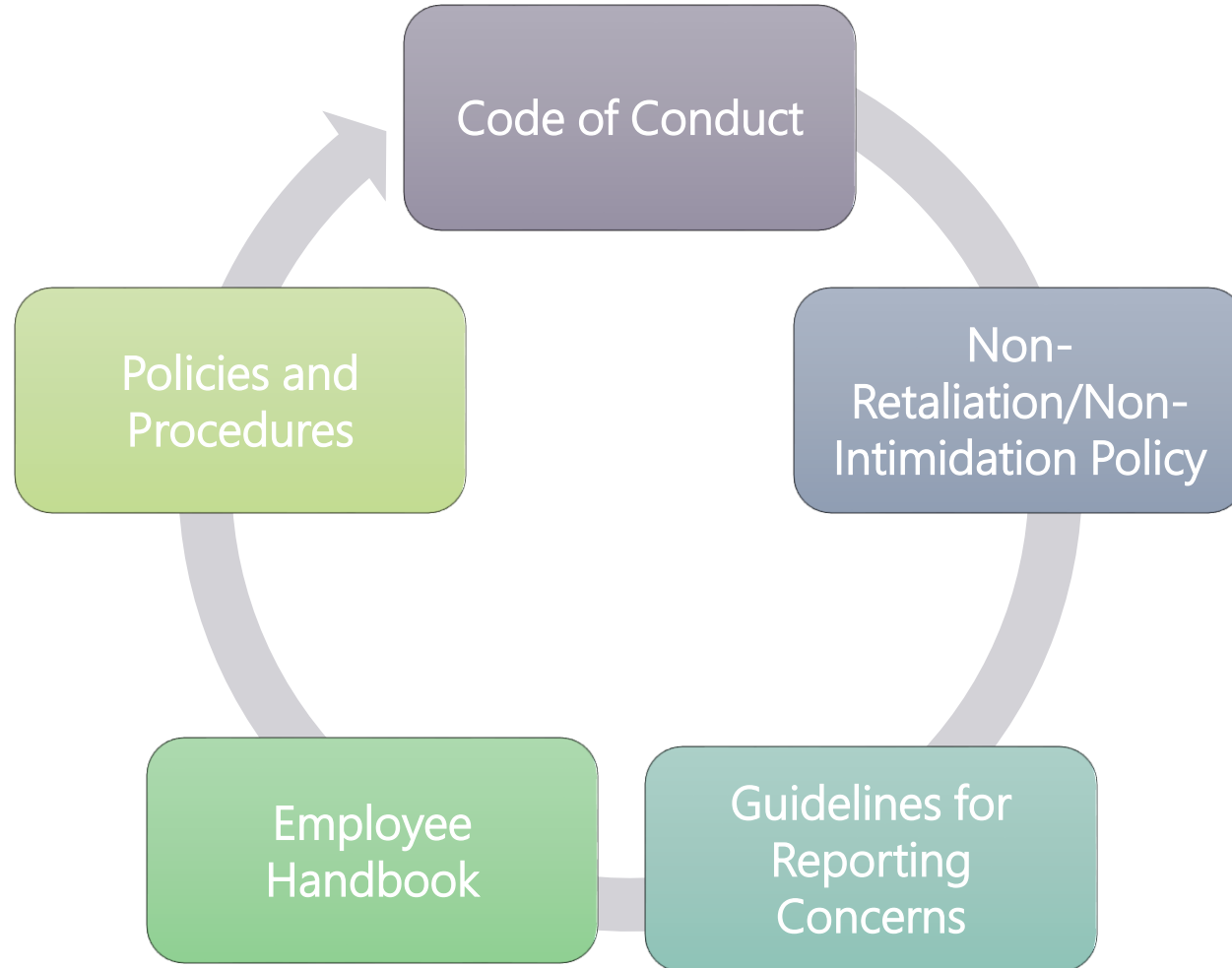


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Elements of a Compliance Program



Compliance Resources



The MVHS Code of Conduct serves as a guide to assist employees in making sound, ethical decisions.

The MVHS Code of Conduct provides standards that protect and promote organizational integrity, honesty, and fairness.

No one will face retaliation for making a good faith report or asking questions.

The Code of Conduct does not address every problem that you encounter but you can always turn to your manager, human resources, compliance or call into the Anonymous Compliance Hotline.



Federal False Claims Act (FCA)

What is it?

- Federal Law (31 U.S.C. 3729-3733) that prohibits health care providers from submitting false information to the Federal government in order to be paid for health care services not rendered.
 - The False Claims Act exists to punish people who commit fraud against the government.

All claims submitted by MVHS must include accurate charges and diagnoses that are supported by medical record documentation.

Examples of false claims:

- Billing for health care services not performed.
- Billing for health care services that do not have documentation to support them.
- Assigning an incorrect procedure code or diagnosis code in order to get paid more money.

Violations of the Federal False Claims Act can result in penalties ranging from

\$5,000 to \$11,000 per claim.



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What is a Conflict of Interest?

- The relationship we have with our patients is, in part, a fiduciary relationship.
- Patients trust us and expect us to act in their best interest by making decisions that are not influenced by the self-interest of their health care providers.
- Personnel should not place themselves in a position where their actions or the activities may have a financial, business, professional, family or social relationship that could be in conflict with the interests of MVHS.



Examples of Conflicts of Interest

A direct or indirect interest in any transaction which might in any way affect an employee's objectivity, independent judgment or conduct in carrying out his or her job responsibilities.

- Conducting any business or performing any services for another individual or company while at work..

- Using MVHS property or other resources for outside activities.

Non-Intimidation and Non-Retaliation Policy

- MVHS feels strongly about a Non-Intimidation/Non-Retaliation work place.
 - A policy has been adopted that protects individuals who report concerns in good faith.
- If an employee reports a concern, and feels they are being intimidated or retaliated against, call the Compliance Department **Immediately!**



What is Non-Compliance?

Non-Compliance is behavior that does not conform to the law, regulation, the Code of Conduct or policies and procedures.

Here are some examples of risk areas:

- HIPAA
- Healthcare Fraud, Waste and Abuse
- Ethical Business Practices
- Conflicts of Interest
- Use of Assets
- Fair Treatment of Individuals
- Improper Use of Funds
- Health, Safety, and Environmental Concerns
- Relations with Vendor-Partners
- Intellectual Property

Consequences of Non-Compliance

Failure to follow Regulatory agency guidance can lead to serious consequences, including but not limited to:

Contract termination

Criminal Penalties

Exclusion from participation in all Federal programs

Civil Monetary penalties

Mandatory Training or re-training

Disciplinary action—up to termination



Reporting Non-Compliance

Compliance is Everyone's Responsibility!

Promptly report any concerns about violations to the Code of Conduct, unethical, or illegal activities to any of the following:

- Contact your manager or a supervisor
 - Notify Human Resources
- Contact Compliance@mvhealthsystem.org
- Contact the Anonymous Compliance Hotline at 1-800-954-9418



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EXIT

Click the **Take Test** button when you are ready to complete the requirements for this course.

Please submit any questions or feedback on this presentation via email to Kathy Fiesthumel, KFIESTHU@mvhealthsystem.org. Please include the module title with your message.



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