

SUBJECT: CODE OF ETHICS (EXAMPLE)	REFERENCE #4002
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APPROVED BY:	EFFECTIVE:
	REVISED:

POLICY:

- Marketing:
 - It is the policy of _____ to restrict all marketing efforts to those services and procedures which are within the technical and licensure limits of the staff and practitioners of _____. Marketing programs will promote the dignity of the individual and present an accurate, honest and straightforward representation of the benefits of diagnostic and therapeutic procedures we provide and the services we have available to our patients.

- Admission, Transfer, Discharge:
 - All decisions to admit, transfer and discharge patients will be based solely in the interest of the patient and his/her medical condition and need requirements to ensure access to appropriate level of care in the appropriate setting and treatment that meets the patient's medical needs.

- Contracting, Disclosure:
 - _____ and its agents will deal fairly and honestly with clients, customers, vendors, competitors, payors and financial partners. All communication and disclosure information shall be accurate, clear and complete to assure reliability. Financial and operational reports shall be accurate, fair and truthful. Patients will be informed of any relationships that exist with regard to contracted services and how they were selected and any financial relationships that exist.

- Billing of Services:
 - _____ will deal honestly with all payors. Billing practices that are accurate, ethical, straightforward and honest shall be maintained and all billing questions will be resolved according to policies, procedures and payor contracts. Questions and conflicts regarding policies, procedures and payors contracts will be resolved in a timely and appropriate manner. Any questions and conflicts regarding patient billing will be resolved without harassment, real or perceived.

- Conflict of Interest:
 - Full disclosure shall be made by any persons having an investment, financial interest or compensation relationship, direct or indirect, with any supplier, client or competitor of _____.

SUBJECT: HOSPITAL COMPLIANCE PROGRAM	REFERENCE #5001
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STATEMENT OF ETHICAL BUSINESS PRACTICE:

- _____ (“Hospital”) has a policy of maintaining a high level of professional and ethical standards in the conduct of its business. The hospital places a high importance upon its reputation for honesty, integrity and high ethical standards. This policy statement is a reaffirmation of our commitment to a high level of ethical conduct and standards of business practice.
- These standards can only be achieved through the actions and conduct of all personnel of the _____ Hospital. Each and every employee, including management employees, is obligated to conduct himself/herself in a manner to ensure the maintenance of these standards. Such actions and conduct will be important factors in evaluating an employee’s judgment and competence and an important element in the annual performance reappraisal. Employees who ignore or disregard the principles of this policy will be subject to appropriate disciplinary actions available.
- Employees must be educated of all applicable federal and state laws and regulations that apply to and impact upon _____ Hospital’s documentation, coding, billing and competitive practices, and the day-to-day activities of the hospital and its employees and agents. Each employee who is directly involved in any of the hospital’s documentation, coding, billing or competitive practices has an obligation to familiarize himself or herself with all such applicable laws and regulations and to adhere at all times to the requirements thereof.
- These employees are also required to participate in the ongoing educational programs provided by this organization. Where questions regarding these requirements exist, each employee shall seek guidance from knowledgeable senior management, the Compliance Officer or legal counsel for _____ Hospital.

SUBJECT: BILLING COMPLIANCE PLAN	REFERENCE #5007
DEPARTMENT: BILLING	PAGE: 1 OF: 1
APPROVED BY:	EFFECTIVE:
	REVISED:

CODE OF ETHICS:

- Purpose:
 - _____ (MCO) has an ongoing commitment to ensuring that its business practices are conducted in accordance with applicable law. _____ (MCO) also has a strong commitment to ensuring all its members and employees are fully informed with regard to all applicable laws and regulations. As a reaffirmation of this commitment, we have established this policy regarding the ethical billing of professional services.
- Billing Compliance Policy:
 - In furtherance of its commitment to compliance and to minimize its financial exposure, _____ (MCO) has adopted a formal written compliance plan to address professional billing. This Professional Billing Compliance Plan (“the Plan”) has the following key features:
 - Designation of a Compliance Officer and Committee responsible for directing the effort to increase compliance, including development and implementation of the billing compliance plan;
 - Incorporation of standards and policies that guide personnel and others involved with the billing process with regard to accuracy and documentation of professional fee billing and services;
 - Development of appropriate compliance initiatives;
 - Coordinated training of clinical and billing personnel concerning applicable billing requirements and other relevant _____ (MCO) policies;
 - A mechanism for employees to raise questions and receive appropriate guidance concerning professional billing from appropriate senior management personnel, the Compliance Officer or legal counsel;
 - Periodic medical record reviews and billing audits to ensure compliance and to identify areas of weakness or areas that require clarification, correction or educational re-training programs;
 - A mechanism for reporting possible compliance issues that affords anonymity, confidentiality and protection from any retaliatory actions;

POSITION DESCRIPTION / PERFORMANCE EVALUATION

Job Title: Corporate Compliance Officer

Supervised by: CEO, Board of Directors

Prepared by: _____ Date: _____

Approved by: _____ Date: _____

Job Summary: Establishes, monitors and updates the facility's corporate compliance program. Demonstrates knowledge and keen understanding of all applicable laws and regulations. Educates all facility personnel, outside contractors and agents of the requirements of the corporate compliance program. Has the authority to recommend disciplinary action when appropriate.

DUTIES AND RESPONSIBILITIES:

E = Exceeds the Standard

M = Meets the Standard

NI = Needs Improvement

Demonstrates Competency in the Following Areas:

	<u>E</u>	<u>M</u>	<u>NI</u>
Supervise the implementation and maintenance of the facility's corporate compliance program to ensure that all facility activities and operations are carried out in compliance with local, state and federal regulations, JCAHO standards and laws governing healthcare operations.	2	1	0
Participate in the development of guidelines concerning state and federal regulations in regards to ethical and legal business practices.	2	1	0
Stay current with changes in state and federal laws, regulations and policies, changes in private payer health plans and incorporate these changes into the corporate compliance program.	2	1	0
Monitors the issuance of fraud alerts by the Office of the Inspector General of the Department of Health and Human Services.	2	1	0
Provide oversight for the training and education of all personnel and agents involved in the clinical and billing/coding areas of the facility, about applicable compliance standards. Assures that all personnel receive training and education in the basic principles of corporate compliance and ethical business practices.	2	1	0
Plans and oversees audits of the facility's corporate compliance program to identify any problems and provide resolution of any problems to ensure the efficacy of the program.	2	1	0
Works well and takes advisement from the legal counsel of the facility.	2	1	0
Ensures all outside contractors and agents are aware of the facility's corporate compliance program in regards to billing, coding, kickbacks, marketing and referrals.	2	1	0
Serves as Chairperson of the facility's Corporate Compliance Committee.	2	1	0
Implements and maintains the Compliance Hotline (reporting noncompliance issues, receiving help and assistance regarding potential violations, as well as general information on corporate compliance).	2	1	0
Develops and implements policies that allow the facility's employees to report noncompliance issues without the threat of retribution.	2	1	0
Refers complaints to appropriate departments for investigation; may implement and coordinate internal investigations.	2	1	0
Investigates all reports of suspected misconduct - both intentional and accidental; refers legal issues to the facility's legal counsel.	2	1	0
After investigation, refers noncompliant conduct as a result of gross misconduct to the appropriate administrative personnel for disciplinary action.	2	1	0