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DMC'S COMMITMENT TO COMPLIANCE:

COMPLIANCE PROGRAM CODE OF CONDUCT 2007



Learning Objectives:

After completing this training module you should be familiar with:

- The Detroit Medical Center (DMC) Compliance Program
- The DMC Code of Conduct
- The DMC commitment to reviewing business activities and providing a monitoring and reporting system



The DMC's Compliance Program:

- Reflects our commitment to ethical behavior
- Depends upon everyone's participation for its continued success
- Has the commitment of everyone at the DMC:
 - The Board of Trustees
 - Senior Management
 - Physicians
 - Employees
 - Volunteers, vendors and others associated with the DMC



Advantages Of An Effective Compliance Program:

A Good Business Practice -- The DMC has taken a proactive approach to problem solving and it protects the reputation of the DMC:

- By utilizing an Annual Disclosure process for Board Members, Senior Management, and employees with signing authority, any actual, potential, or perceived Conflicts of Interest are identified
- Formalized business practices -- create consistency throughout the system and requires the DMC to continually evaluate these practices



Advantages Of An Effective Compliance Program:

- With increased government enforcement, the DMC Compliance Program allows focused efforts to meet the rules, laws, and regulations designed to eliminate fraud and abuse in healthcare.

The DMC must be able to demonstrate that we operate with integrity and within the law.



The DMC's Compliance Program Has Seven Elements:

1. Policies and procedures to guide our compliance.
2. A Compliance Officer to oversee the program.
3. Education and training for employees on compliance issues.
4. Monitoring for unlawful activities within the DMC.
5. Reporting mechanisms when unlawful activities are discovered.
6. Written guidelines for dealing with employees who engage in unlawful activities.
7. Responding to detected offenses.





Compliance Policies:

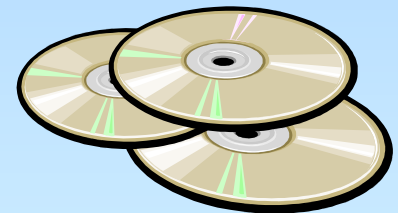
The DMC has policies and procedures in place to ensure compliance with laws and regulations.

The objectives of these policies are to:

- Standardize the way we do business
- Demonstrate that the DMC has an effective Compliance Program

The source of truth for policies is the DMC
Intraweb:http://intraweb/main_dmcinfo/policies

Policy CD's are available in the event the DMC
Intranet is unavailable.



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Compliance Policies:

Policy Name	Summary
Non-Retribution DMC policy 1CG-011	Allows employees to identify and report problems without fear of retaliation.
Employee Hotline Operation DMC policy 1CG-012	Establishes an anonymous method to report suspected criminal activity, illegal or unethical conduct.
Sanction Screening DMC policy 1CG-013	Describes how we check physicians and staff to ensure that they are allowed to participate in the Medicare and Medicaid programs. The government excludes, or “sanctions” physicians and clinicians if they are convicted of a crime.
Education and Training DMC policy 1CG-014	Describes how we inform staff of the compliance program and their responsibilities.



Compliance Program Oversight:

The DMC Board of Trustees together with our President/CEO has appointed its *Corporate Vice President Chief Compliance & Governance Officer* to oversee the Compliance Program. To assist the Vice President:

- A *Corporate Compliance Committee* has been created. The committee is composed of members of our DMC management and provides guidance, advice, resources and feedback on our efforts and programs.



Your Role:

Our Commitment to Compliance depends upon everyone's participation for its continued success.

To fulfill your role, you must commit to the following:

- **Complete all annual compliance training assigned to you and sign a commitment form**
- **Watch for problem areas (areas of non-compliance) while on the job and report any areas of potential non-compliance**
- **As a condition of employment, agree to read and abide by the Code of Conduct and DMC policies and procedures**



Employees Are Educated And Trained To:

- Comply with laws, policies and procedures
- Spot potential compliance concerns, such as:
 - Unethical or illegal behavior
 - Medically unnecessary services being provided
 - Unfair or discriminatory treatment of a patient or employee
 - Billing or coding error that benefits the DMC
 - Unauthorized use or disclosure of Protected Health Information (PHI)
 - Misuse of DMC property
 - Fraud, waste or abuse



Code of Conduct:

Under our Compliance Program, the DMC provides employees with a booklet called the “Code of Conduct”. A copy of the “Code of Conduct” is given to each employee upon hire, as part of this training:

The Code of Conduct booklet:

- Provides guidance to ensure that our work is done in an ethical and legal manner
- Emphasizes the shared common values that guide our actions and helps resolve questions about appropriate conduct



Code of Conduct:

Following the “Code of Conduct” is **mandatory** for all DMC employees, staff and affiliated persons. While the Code of Conduct provides a basic description of unacceptable conduct or performance it does not cover all behaviors that may occur in the workplace.

Failure to comply with the code is a serious matter and can lead to disciplinary action (up to and including termination).



Code of Conduct Standards:

Standard	DMC Commitment
Standard 1 Quality of Care and Services	To improve the health of the community we serve by providing the highest quality health care services in a caring and efficient manner.
Standard 2 Privacy and Confidentiality	To fulfill regulatory standards designed to handle all facets of information management including reimbursement, coding, security, and patient records.
Standard 3 Coding/Billing Integrity and Record Keeping	To maintain timely and accurate patient records and bill only for services actually rendered as.



Code of Conduct Standards:

Standard	DMC Commitment
Standard 4 Customer Service	To apply the Customer Service Standards, which are core to our values, to every interaction with every individual at all times focusing on servicing our patients and families.
Standard 5 Compliance with Laws and Regulations	To require all staff members to conduct their individual duties and all DMC operations in a manner that meets all applicable legal, ethical and regulatory standards.
Standard 6 Work Place Conduct and Employment Practices	To create a work environment in which employees, physicians, and others are treated respectfully, fairly, and afforded opportunities for professional development.



Code of Conduct Standards:

Standard	DMC Commitment
Standard 7 Research	To follow ethical standards in any research conducted by physicians and other professional staff.
Standard 8 Conflicts of Interest	To regulate our activities to avoid conflicts of interest, actual impropriety and/or an appearance of impropriety.
Standard 9 Protecting Property, Assets and Information	To protect both our assets, and those assets of others entrusted to us against loss, theft, destruction, and misuse.



Monitoring and Reporting:

The DMC continues to review its business activities to ensure that employees are abiding by law and established policies.

Examples of the DMC monitoring its activities include:

- Performing background checks on new employees
- Auditing departments to ensure they are following established policies and procedures

The DMC encourages and expects employees to report any concerns or suspected violations.

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Monitoring and Reporting:

Employees should first talk with their supervisor or use their normal chain-of-command when reporting a compliance issue, any observed or suspected HIPAA breach, or concern.

NON-RETALIATION

No one will be punished or terminated simply for calling the Hotline or reporting a compliance-related problem.

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DMC Compliance Hotline:

The *DMC Compliance Hotline* is offered to employees as a way to report suspected compliance violations when normal channels of communication are ineffective. Employees who choose to call the hotline may remain anonymous.

DMC Compliance Hotline: 1.888.484.9200

- 7 Days a Week/24 Hours a Day
- Untraceable; anonymous

You may also call the DMC Corporate Audit and Compliance Department at: 1.313.993.0317



Investigations:

- All reported concerns will be reviewed
- A suspected violation brought to the attention of management will be reviewed promptly and reported to appropriate parties who will assist in resolving the problem
- All reported information will be kept confidential and only shared with those individuals who need to know in order to conduct an investigation, to correct the situation, or as required by law



Penalties:

If an organization or person is found to be in violation of fraud, waste, and/or abuse laws or regulations the penalties are severe:

- Disciplinary action up to and including termination
- Exclusion from participation in Medicare and Medicaid programs
- Jail sentences for employees, administrators, and physicians



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Training Program:



For more information, to schedule a live presentation or to discuss any part of the DMC's Commitment to Compliance:

Please contact DMC Corporate Audit and Compliance Department at: [1.313.993.0317](tel:1.313.993.0317)

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Summary:

We hope this NetLearning course has been both informative and helpful.

Feel free to review this course until you are confident about your knowledge of the material presented.

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

Click on the My Records button to return to your CBL Courses to Complete list.

Click the Exit button on the left to close the Student Interface.