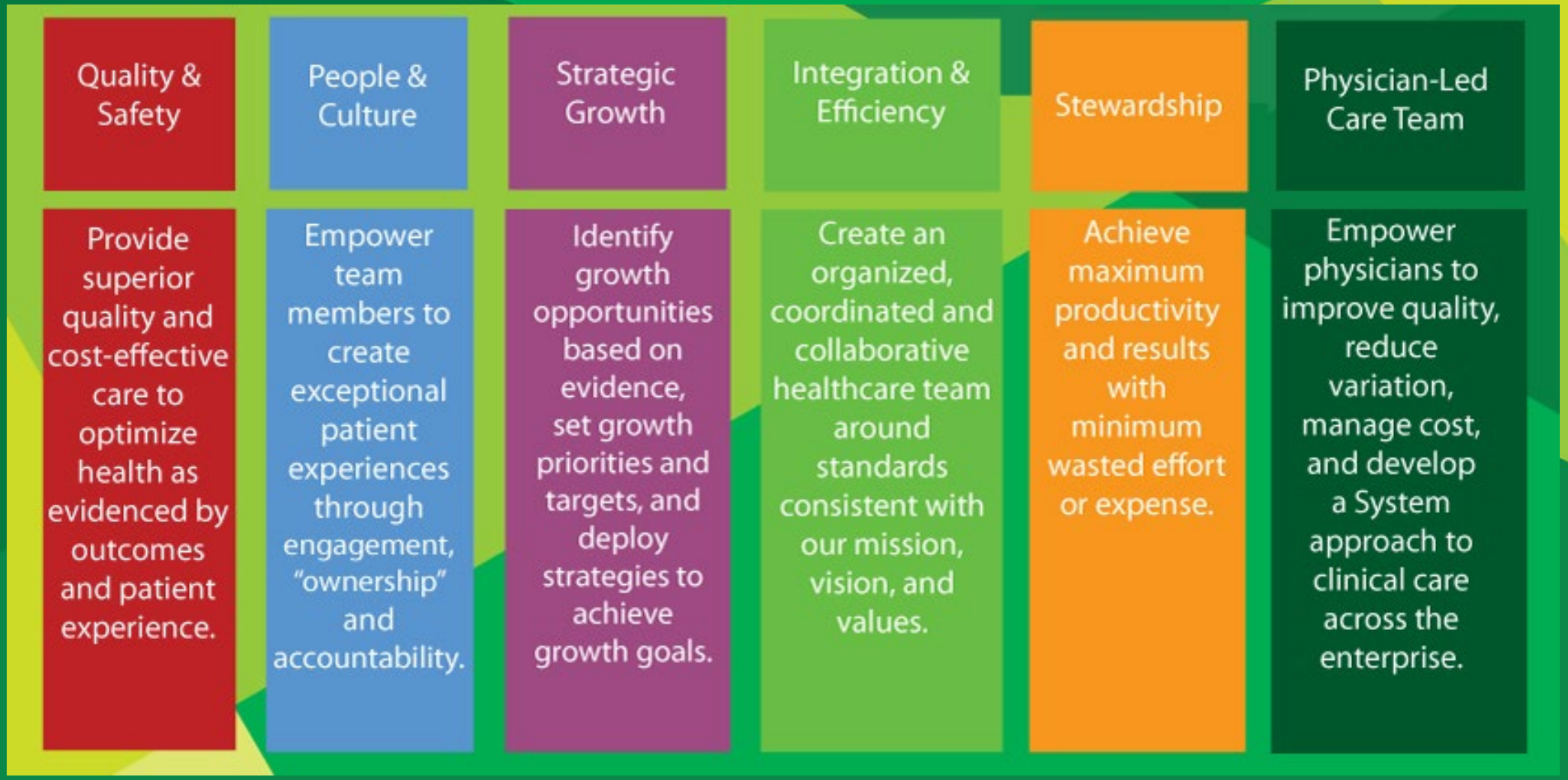
WELCOME.

Corporate Compliance for Providers

Choose Mon Health. *Feel The Difference.*

MHS PILLARS


Quality & Safety
Provide superior quality and cost-effective care to optimize health as evidenced by outcomes and patient experience.
People & Culture
Empower team members to create exceptional patient experiences through engagement, "ownership" and accountability.
Strategic Growth
Identify growth opportunities based on evidence, set growth priorities and targets, and deploy strategies to achieve growth goals.
Integration & Efficiency
Create an organized, coordinated and collaborative healthcare team around standards consistent with our mission, vision, and values.
Stewardship
Achieve maximum productivity and results with minimum wasted effort or expense.
Physician-Led Care Team
Empower physicians to improve quality, reduce variation, manage cost, and develop a System approach to clinical care across the enterprise.

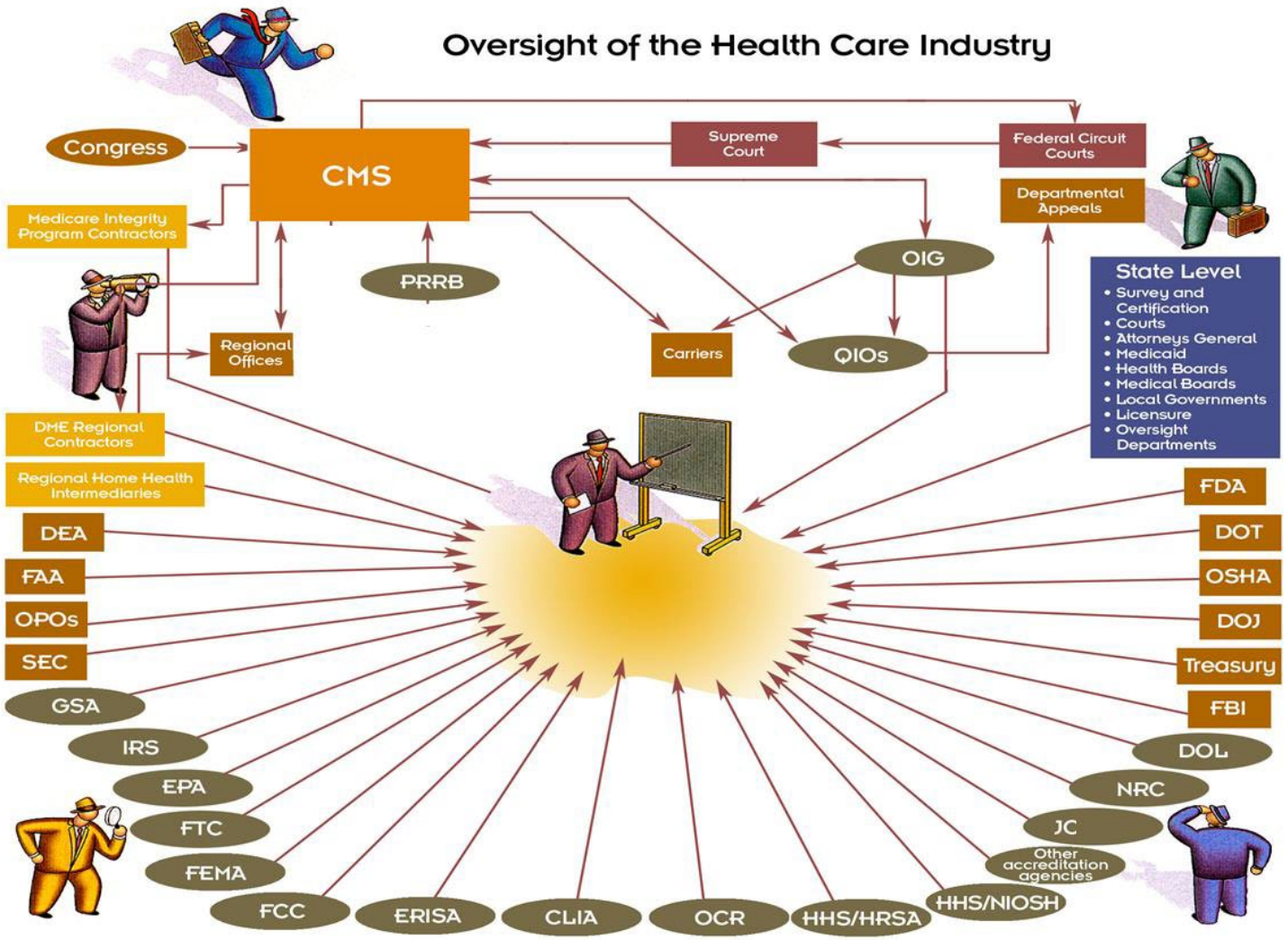
Compliance Program Purpose

- Mon Health is committed to maintaining a culture that promotes the prevention, detection and resolution of behaviors that do not conform to laws, regulations, the Mon Health Code of Conduct which embraces MHS Value Pillars

Standards of the Code of Conduct
Expectations of Workplace Behaviors

- Foundation for **behavior** of ALL members of Mon Health team
  - Provide Quality Care and Services.
  - Respect all
  - Promote Fair Employee Treatment.
  - Comply with the Law in All Business Practices.
  - Respect and Protect Confidential Information.
  - Code, Bill, and Collect in Accordance with Applicable Guidelines.
  - Avoid Conflicts of Interest.
  - Safeguard Assets, Property, and Information.
  - Maintain a Safe Environment.

Healthcare Regulatory Oversight



Laws and Regulations

Medicare Conditions of Participation for Hospitals (CoPs)

- These health and safety standards are the foundation for improving quality and protecting the health and safety of beneficiaries.

False Claims Act

- Imposes civil liability on any person or entity who submits a false or fraudulent claim for payment to the United States government.

Stark Prohibitions

- Legislation that prohibits a physician from referring Medicare or Medicaid patients to an entity for designated health services (DHS) if the physician or an immediate family member has a financial relationship with that entity.

Anti-Kickback Legislation

- Knowingly and willfully soliciting, receiving, or offering to pay remuneration for referring individuals, for purchasing or leasing goods or services that can be made under federal health program.

Your Commitment

- "Doing the right thing, the right way each and every time."

- <u>The Right Thing</u>: Following national standards, clinical policy and procedure

- <u>The Right Way</u>: ...with COMPASSION. Treat our patients and your teammates with respect.

- <u>Every Time</u>: Consistency brings positive outcomes. ERRORS may happen and can be handled. But...FAILURE happens when we are consistently not doing the right things.

Documentation Responsibilities

Once Upon a Medical Record tells a story: It is your story about the patient's time in your care. Your story has **four audiences**:

- The other medical professionals caring for the patient
- Billers/Coders submitting claims for payment
- Surveyors or lawyers determining if you care was appropriate
- Regulatory auditors determining the level of medical necessity and accuracy of codes

The story you write, whether it is correct or incomplete, is the final account of what happened with that patient.

REMEMBER! "If it wasn't documented in the medical record, it didn't happen."

Emergency Medical Treatment & Labor Act (EMTALA)

EMTALA (Emergency Medical Treatment and Active Labor Act)

- Requires that all patients who come to the emergency room seeking either an exam or treatment for a medial or psychiatric condition receive a medical screening exam. 250-yard radius sidewalks and parking lots

MSE (Medical Screening Exam)

- Completed by either a Physician or an Advanced Practice Professional.
- Triage does not count as an MSE.
- The MSE should be consistent to the patient population type (ex: chest pain, stroke, abdominal pain).

EMC (Emergency Medical Condition)

- A qualifying condition that manifests itself by acute symptoms of sufficient severity such that absence of immediate attention could reasonably expected to result in placing the individual's health in jeopardy. Ex: severe pain, acute Pain, contractions.

Other requirements:

- On-Call List
- Signage
- Logs

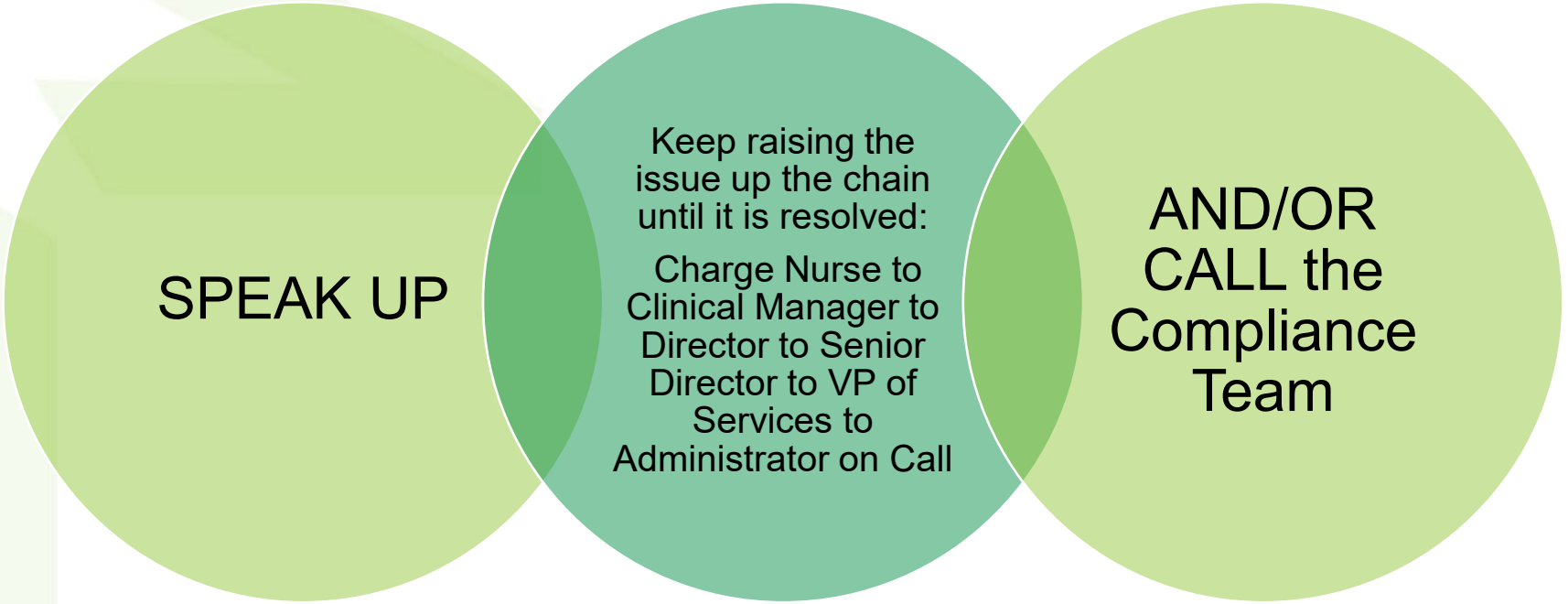
Expectations for Vendor Management

- Everyone will always have an identification badge
- Vendors have specific criteria/credentialing requirements for entry into **any** Mon Health facility
- Vendors will have an appointment with a designated person
- Designated person escorts the vendor to the entrance upon completion of the appointment

Issues or Concerns?
Contact the Supply Chain Management Office

Speaking up

- If you feel as though an event has occurred:



Compliance Contact Information

COMPLIANCE HOTLINE

844-536-3273

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