

How is Compliance
organized and how to
report unusual activity
within CHG



Seven essential elements of an Effective Compliance Program (paraphrased)

1. Standards and Procedures
2. Oversight
3. Education and Training
4. Monitoring and Auditing
5. **Reporting**
6. Enforcement and Discipline
7. Response and Prevention



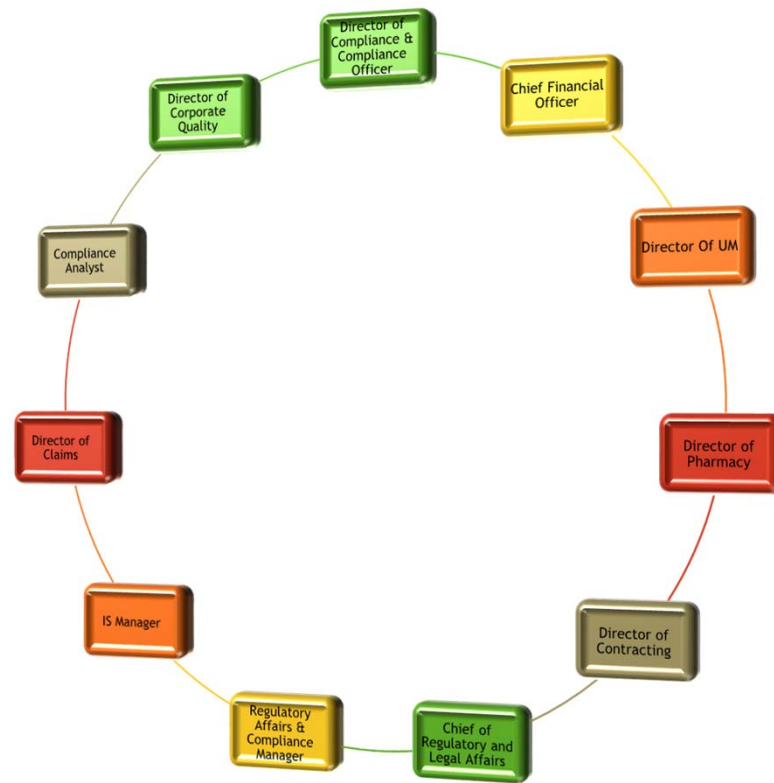
How is Compliance Organized?



Structure of CHG's Compliance Program

- ❖ Ultimate Authority - The Board
- ❖ CEO
- ❖ Compliance Officer
- ❖ Compliance Committee
- ❖ Policies and Procedures
- ❖ Education and Training
- ❖ Reporting Mechanism
- ❖ Audits and Investigations
- ❖ Discipline and other remedial measures

The Compliance Committee



Reasons to Implement a Compliance Plan

- ❖ Demonstrates the organization has a strong commitment to honesty and responsible corporate integrity.
- ❖ Helps an organization fulfill its legal duty to the government.
- ❖ Compliance programs are cost effective.
- ❖ Provides guidance and procedures to promptly correct misconduct.

Types of FWA

- ❖ Managed Care Organization Fraud
- ❖ Member Fraud
- ❖ Provider Fraud
- ❖ Pharmacy Fraud

Healthcare Fraud

- ▶ http://www.youtube.com/watch?v=I3ooR8aU_Ww&list=PLbkxv6PZfshcTV_xtFa1-T0FefFgY753z
- ▶ <http://www.youtube.com/watch?v=bfHAXmIW72I&list=PLbkxv6PZfshfE7hWcgGuA8BS0HniFBsSE>

Reporting



▶ Hotline/Helpline

- ▶ Essential program resource for reporting potential wrong-doing and/or seeking help and guidance
- ▶ Anonymous & confidential to extent allowed by law
- ▶ Policy on non-retaliation/non-retribution essential
- ▶ Fear of retaliation and perceived inaction-top 2 reasons people don't call back
- ▶ Address matters in a timely and consistent way

Employee reporting an issue

- ▶ If an employee has any questions or wishes to report a problem, that employee should talk to a supervisor or other member of the management team, and/or speak to the Human Resources Department. If the problem cannot be resolved through normal communication channels, or, for any other reason, the employee does not wish to use these channels; the problem should be reported to the Compliance Officer, or to the Compliance Hotline, (800) 651-4459. A report can be made to that Hotline on an anonymous basis.



Non-retaliation Policy

- ▶ CHG's management team is responsible for the creation of a work environment in which employee concerns can be raised and openly discussed and resolved. No disciplinary action or other form of retaliation or revenge shall be taken against any person who reports a perceived issue, problem, concern or violation to supervisors, management, Human Resources, the Compliance Officer, the Compliance Hotline, or a regulatory agency "in good faith." The "in good faith" requirement means a person actually believes or perceives the issue or problem to be true. Reporting does not protect individuals from appropriate disciplinary action regarding their own improper performance or conduct.



Report Report Report!

- ▶ All employees are urged to report concerns and issues to their supervisor or through the proper chain of command. However, CHG recognizes that there are instances when employees may feel their concerns cannot be properly addressed through the normal chain of command or other methods of communication. When such situations develop, employees are encouraged to contact any member of the management staff, Human Resources, the Compliance Officer, or call the Compliance Hotline. CHG has established a toll-free number for this purpose, (800) 651-4459. A report can be made to the Hotline on an anonymous basis.



Why report a concern?

- ▶ It is your responsibility
- ▶ It makes for a more comfortable and positive work environment
- ▶ It helps our Organization improve
- ▶ It makes management aware that a concern exists so it can be looked into
- ▶ Your wishes for confidentiality will be respected to the greatest extent possible, and if you are worried about it, report anonymously
- ▶ You will not be retaliated against for reporting your concern
- ▶ You will be showing excellent ethical decision-making skills
- ▶ You will be appreciated and thanked for stepping forward



Compliance available to you 24/7

- ▶ Compliance Hotline number: 1(800) 651-4459
- ▶ You can leave a message 24 hours a day, seven days a week
- ▶ To ensure confidentiality to all callers of the Compliance Hotline, calls to the hotline will not be traced. If callers choose to identify themselves, we will make every reasonable effort to protect their confidentiality. No disciplinary action or retaliation will be taken against anyone for calling the Compliance Hotline in good faith. However, reporting does not protect callers from appropriate disciplinary action regarding their own performance.



What happens when you report?

