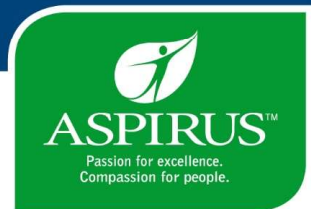


Compliance Overview

For Leaders Transitioning from Ascension

Scott Remmich, Chief Compliance Officer



Objectives

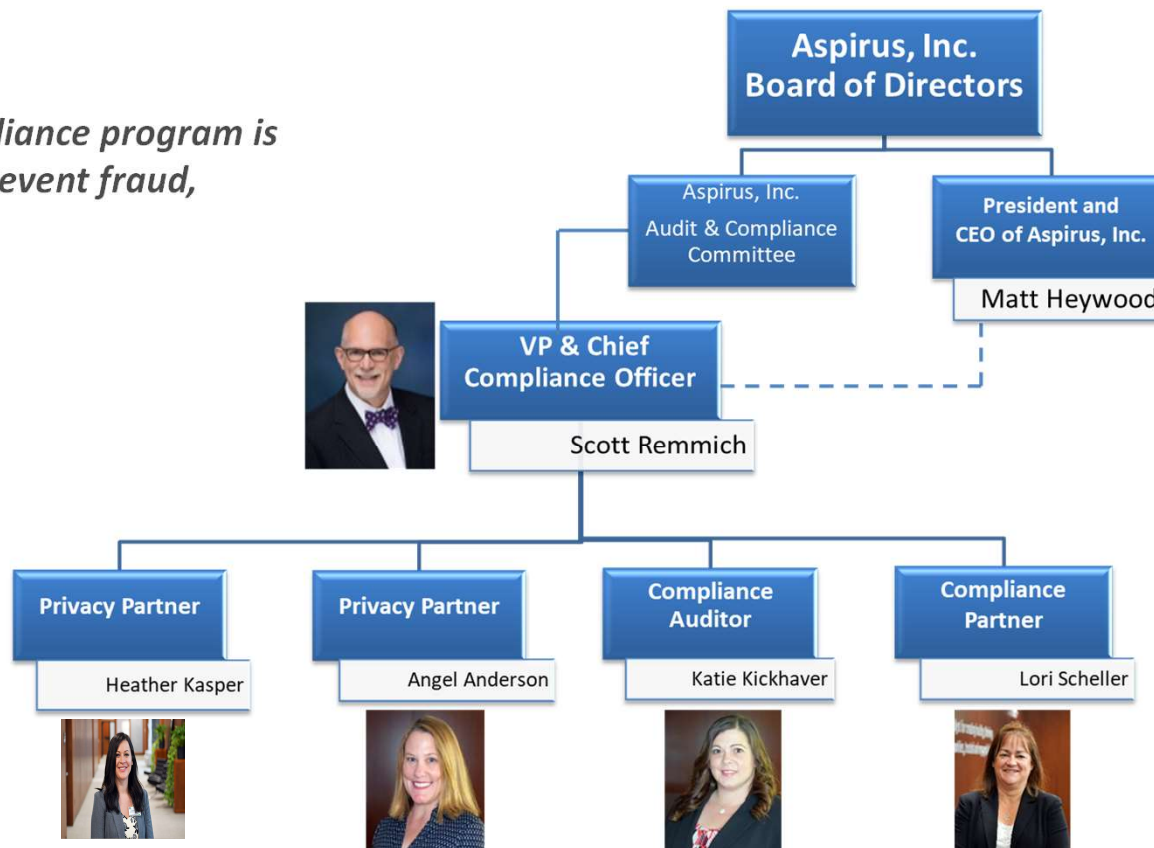
- Compliance Program and Resources
- Responsibilities in the Program
- Common Risk Areas
- Scenarios

“Close to Home”








- In October 2020, a Wausau pain management company (“Company”) agrees to \$1M settlement...
- For allegations the Company performed confirmatory urine drugs tests that were not medically necessary and billed them federal healthcare programs...
- For improper compensation arrangements that were tied to the volume of procedures at Company’s ambulatory surgery centers...
- For gifting shares of incentive stock to non-employed physicians to be redeemed up the sale of Company and as a reward for referrals...
- The whistleblower lawsuit was filed under qui tam provisions of False Claims Act.

Purpose of a Compliance Program

The purpose of a compliance program is to deter, detect, and prevent fraud, waste and abuse...



How Do We Administer the Compliance Program?

-  Compliance governance structure and resources
-  Policies/procedures and Code of Conduct
-  Education and training
-  Auditing and monitoring
-  Reporting mechanisms
-  Investigations
-  Corrective action

Compliance is everyone's responsibility

What is Your Role in the Program?

- Be a role model and advocate for compliance.
- Understand the purpose and benefits of Compliance Program.
- Awareness of Compliance resources.
- Familiarity with Code of Conduct and Compliance policies.
- Obligation to seek guidance and report concerns.
 - Compliance Helpline
 - **800-450-2339 or through SafetyZone**
 - compliance@aspirus.org
 - Anonymous report
 - Non-retaliation
- Report concerns and participate in compliance investigations and corrective action.
- Complete Compliance training.
- Accountable to and responsible for the risk.

Scenarios/Risks



Examples of Compliance Risks

- Physician Compensation Arrangements
- Emergency Medical Treatment and Active Labor Act (EMTALA)
- Patient Privacy and Information Security
- Documentation, Billing, and Coding
- Conflicts of Interest
- Scope of Practice
- Prescription Fraud / Opioid Abuse
- Quality of Care

Compliance/Regulatory

- Treat a medical condition and prescribe medications for father of your spouse – Ethical boundaries, Billing.
- Hospital distributes lab coats to providers during “doctor’s” week – Physician financial relationships.
- You are considering a change to allow Nurse Practitioners and/or Physician Assistants to admit and discharge hospital patients – Billing/Scope of Practice.
- Local pharmacy notifies hospital with suspicious prescription for controlled substance – Prescription fraud/Diversion.
- You are requested to speak at several national conferences on behalf of a medical device company. Aspirus also purchases devices from this same medical device company – Conflict of Interest, Kickback, Sunshine Act.

HIPAA

- You are curious about your spouse's test result and the treatment prescribed by the provider and log into the electronic medical record to view results.
- Several office staff are printing documents to the same printer and you grab discharge paperwork and provide it to your patient. The patient arrives home and notices the paperwork is for a different patient.
- Family member complains to unit manager that he overheard office staff talking to a local pharmacy about another patient's medical history and discharge medications.
- You complete the documentation after seeing patients on the telemetry unit. Upon exiting the electronic medical record, you follow process to log off the computer, but skip the final step. An oncoming nurse arrives to log into that computer and begins to document on his/her patients.
- You are curious to know about your CT scan results that were completed yesterday and log into the electronic medical record to review the report.
- My co-worker is on medical leave and the team would like to send a get well card. You don't know the mailing address and access the electronic medical record for this information.

Compliance Team

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QUESTIONS