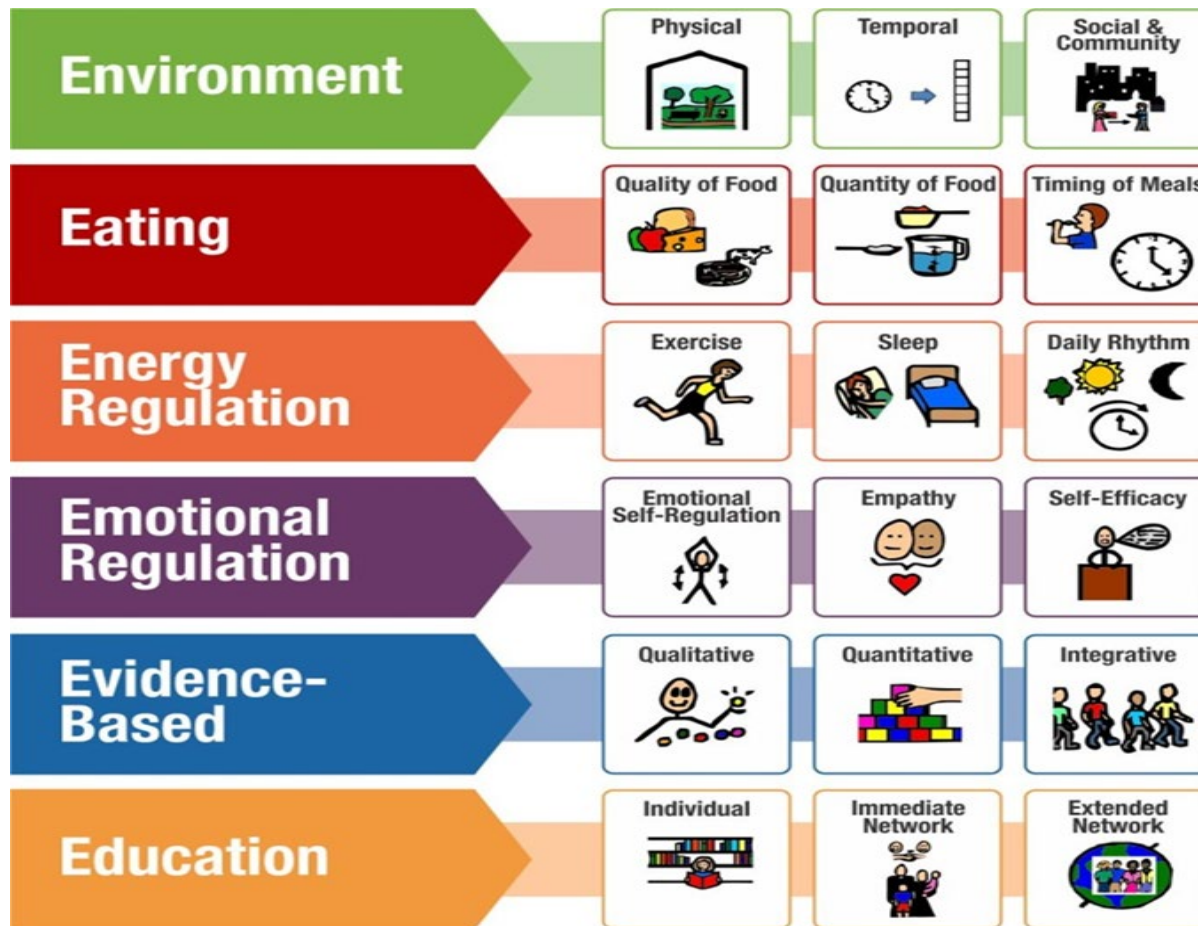




Corporate Compliance/HealthE6 Category: Evidence-Based

Dr. Jocelyn R. Tambascio, Ed.D.

Chief of Quality Improvement & Regulatory Training



Corporate Compliance

This training has been developed to assist all staff at the Center for Discovery to understand the ethical responsibility they have in the daily work they do. Their work impacts the lives of others. It requires that they adhere to moral standards, and take pride in their work. Failure to do so can result in serious issues.

Corporate Compliance



This training is designed for all Center for Discovery staff members attending basecamp. It will be repeated annually, in a different form and format in location or online.

Corporate Compliance

OBJECTIVES

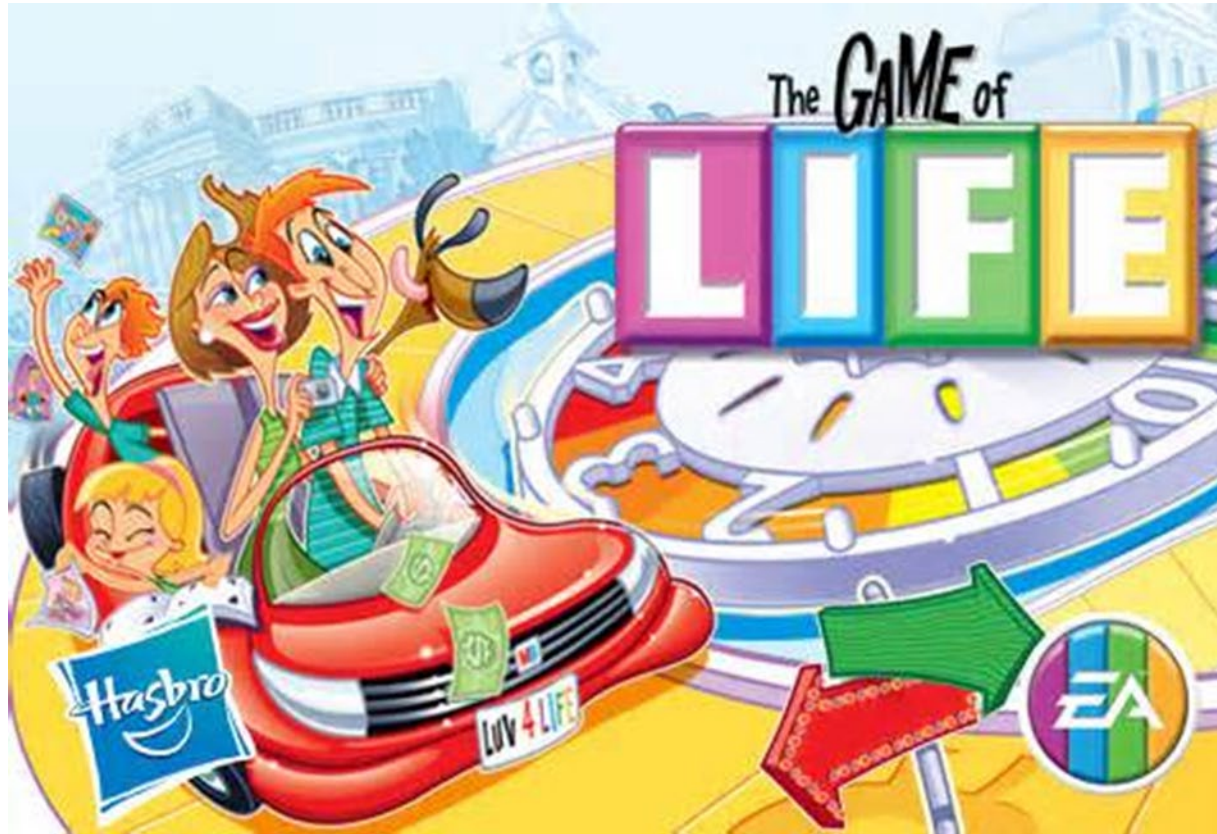


Name several expectations for ethical behavioral at the Center for Discovery



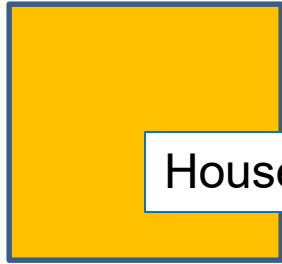
List methods for successful audit performance

Corporate Compliance &



Team Selection





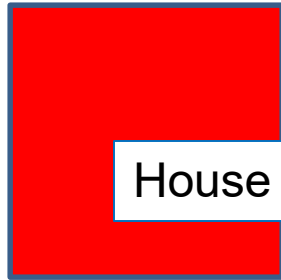
House & Car

- Steven Mosenson is the General Counsel for The Center for Discovery. What is a General Counsel?

Steven Mosenson

- Steven Mosenson is also the Center for Discovery's Corporate Compliance Officer
- Serves as a resource
- Provides guidance to all departments
- Responds to compliance issues (himself or via designee)





House & Car

- One role of the corporate compliance department is to conduct audits. What is an audit?



House & Car

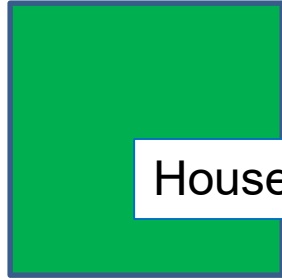
- Audits conducted internally by the corporate compliance department and by external bodies (Office of the Medicaid Inspector General) focus on use of Medicaid funds. What is Medicaid?

Mandatory Compliance Program

- Social Services Law § 363-d
 - Medicaid providers must develop and implement compliance program aimed at detecting waste and abuse in the Medicaid program.

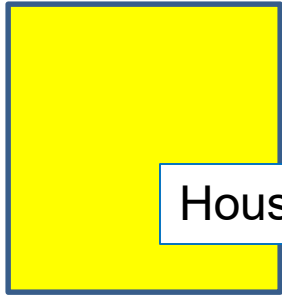
Office of the Medicaid Inspector General

- Dennis Rosen, Medicaid Inspector General for New York State
- Conducts and coordinates waste, and abuse prevention and detection
- Improves and preserves integrity of the Medicaid program



House & Car

- One of the things The Center for Discovery has to guard against is fraud. What is fraud?



House & Car

- What is the difference between fraud and a mistake?

Audits & Recoveries

- The Medicaid Inspector General conducts audit. Repayments can happen in two circumstances.
 - Fraud
 - Improper practices

Defining Fraud

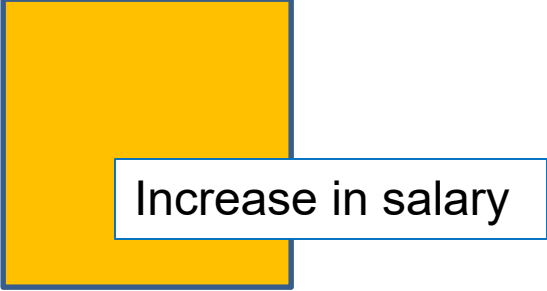
- Presenting any false claim for payment
- **KNOWINGLY** making or using false records to make a claim or avoid a payment (**on purpose**)
- Providing false information by remaining deliberately ignorant of the truth of a situation
- Providing false information with reckless disregard of the truth

Defining Improper Practice

- Simple Error
- No intent to defraud necessary
- Error in documentation related to service delivery (regardless of whether or not a service was performed)
 - Omission, incomplete documentation, mis-categorization

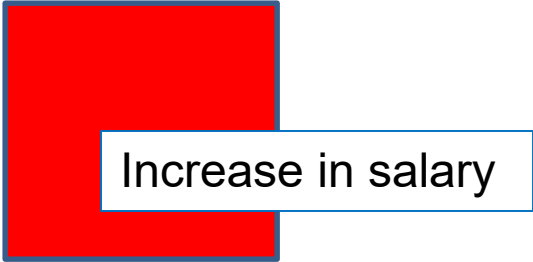
Business Integrity

- Approved by Board of Directors
- Demonstrates good corporate citizenship
- Compliance with laws & regulations
- Corporate Integrity Department
 - Quality Improvement
 - Corporate Compliance
 - Maintains Independence
 - Identifies risk areas
 - Reviews & enforces policies



Increase in salary

- The Center for Discovery maintains a Code of Conduct by which all staff must abide. What is a Code of Conduct and where can you find the Center for Discovery's Code of Conduct?



Increase in salary

- What must you do if you see something that is not consistent with the Center for Discovery's expectations for ethics and integrity?

Reporting Hotline

CORPORATE COMPLIANCE

CORPORATE COMPLIANCE HOTLINE

1-845-707-8811

or Extension 8811 from any Center phone

- Download the Hotline Q and A Sheet [PDF](#)
- Download the Agency Code of Conduct [PDF](#)
- Download the Corporate Compliance Program [PDF](#)

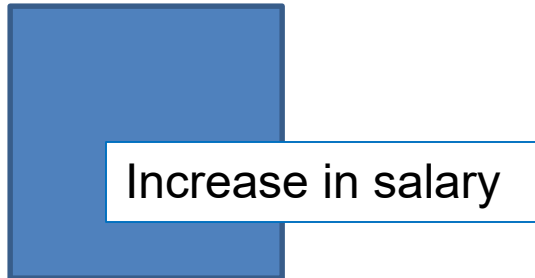
THE CENTER FOR DISCOVERY, INC.

Help Us Maintain Our Ethical Standards

If you believe that a member of The Center community is not living up to the highest standards of business ethics and integrity, or has committed fraud, please call the

Business Integrity Hotline
1-845-707-8811

Or call ext. 8811 from any Center phone
Confidential



Employees who report issues may not be intimidated or retaliated against for their reporting. What does it mean to retaliate?

Intimidation or retaliation will not be tolerated against an individual who in good faith participates in the compliance program, including but not limited to: reporting potential issues, investigating issues, self-evaluations, audits, remedial actions, and reporting to appropriate officials as provided in Sections 740, and 741 of the NYS Labor Law

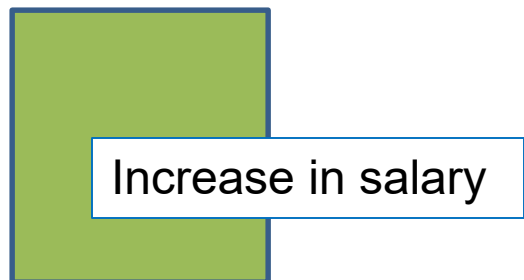
Non-Intimidation & Non-Retaliation

- Non-retaliation policies apply uniformly to all staff
- An employee who reports fraud will be offered protections as defined by law
- An employee who is a participant of the wrongful activity is not protected by making a report about that activity **(If you are involved, you aren't protected)**
- If the claim is not substantiated and it is determined that an employee's filing the claim was done maliciously, the person will be disciplined **(Reports must be truthful – be honest)**

US & NYS False Claims Act

- Federal False Claims Act, 31 USC §§ 3729-3733
- NYS False Claims Act, State Finance Law, §§ 187-194

The Center for Discovery is required to investigate any reports of fraud. If they don't, you can take your complaint further, including taking legal action.



- When an audit occurs, and there are findings, an agency may be at risk for extrapolation. What is “extrapolation?”



Increase in salary

- If you need to make a change to an existing document, how should you go about doing it?

Clinical Records

- Do not use pencil, red ink, or markers
- Do sign your entry with your full name, title and the current date
- If you use your initials, make sure they are legible and record your full name in a key
- Do not use nicknames
- Do not use white out
- Do not sign anyone else's name or initials



Love & Marriage

- Documentation must be contemporaneous. What does the word contemporaneous mean?

Documentation

- Do not shred any documentation, unless told to do so by a supervisor
- Do not write service notes for services that were not delivered
- When a supervisor signs off on a billing sheet that means he or she has checked and verified its accuracy



Love & Marriage

- While working at a residence, the parent of a resident slips you a \$100 bill, asking you to keep a special eye out for her child. Is it ok to keep the money?

Avoiding Conflicts of Interest

- Act in a manner consistent with our mission
 - ways gifts CAN be given
- Avoid all actual and perceived conflicts of interest
- Avoid gifts that may compromise your integrity and judgment



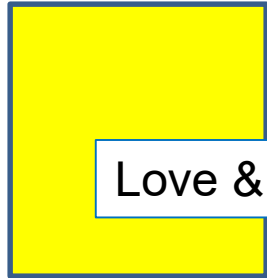
Love & Marriage

- When you are at the Thanksgiving dinner table, is it OK to talk about all of the different medical conditions the people you care for at the Center for Discovery have, giving their names, so that your family will be impressed at how hard you work?



Love & Marriage

- Entries in records must not contain jargon. What is jargon?



Love & Marriage

- Entries in records must be concise.
What does the word concise mean?

The 7 C's

- Entries in records must be:
 - Contemporaneous
 - Clear
 - Concise
 - Consistent
 - Complete
 - Common Sense
 - Confidential

Your Ethical Responsibility

- To do your best...
- To adhere to the ethical standards of the Center for Discovery
- To take pride in your work

Questions?

