

# **Employee Responsibility with the Business Ethics & Compliance Program**

## **PURPOSE:**

To provide written guidelines to all employees on their responsibility in the operation of Shepherd Center's Business Ethics & Compliance Program.

## **POLICY:**

Shepherd Center will comply with all applicable Federal and state statutes and regulations that pertain to the prevention, detection and correction of fraud, waste or abuse in the provision of health care services and reimbursement claims related thereto. Shepherd Center employees will utilize all available means to prevent, detect and correct (and, if necessary, report to the Chief Compliance Officer) any instances of fraud, waste or abuse in their department/program.

## **DEFINITION:**

1. Fraud - an intentional deception designed to unlawfully deprive an individual or institution of something of value.
2. Waste - the extravagant, careless or needless expenditures of funds due to erroneous practice systems, controls or decisions.
3. Abuse - intentional, wrongful or improper use of position, financial arrangement or authority to the benefit of one entity over another.

## **PROCEDURE:**

Shepherd Center employees will:

1. Support the Business Ethics & Compliance Program, particularly as it relates to the prevention, detection and correction of fraud, waste and abuse.
2. Follow applicable department/program internal controls pertaining to Shepherd Center's Business Ethics & Compliance Program.
3. Maintain, and assist in maintaining, proper documentation for billing purposes.
4. Follow applicable department/program internal controls to ensure proper accounting of all patient charges that could affect reimbursement from third-party payors.
5. Assist their Department/Program Directors in the prevention, detection and resolution of instances of conduct that do not conform to Federal and state law(s) or the Business Ethics & Compliance Program.
6. Review annually, and adhere to daily, Shepherd Center's Code of Conduct.
7. Be familiar with the objectives of the Business Ethics & Compliance Program.
8. Alert applicable supervisory personnel, Senior Management and/or the Chief Compliance Officer to any questionable or potentially unethical/unlawful business practices.
9. All employees are expected to alert the Compliance Department or Human Resources immediately if they believe that any of their activities may constitute a Conflict of Interest with Shepherd Center.

10. Report suspected fraud, waste or abuse to one or more of the following:
  - a. Immediate Supervisor
  - b. Chief Compliance Officer
  - c. 24-hour toll-free Compliance Hotline\*

\*Note: The employee may remain anonymous when reporting incidents of fraud, waste or abuse.