

Overview of Healthcare Compliance

Non-Employee Annual Compliance Training



Shepherd Center

Our Commitment



Shepherd Center's commitment to ethical conduct and compliance depends on every employee. Ethics and accountability are essential to Shepherd's core values and mission. This training module will give you the understanding of how to contribute to a culture of doing the right thing...

EVERYDAY!



Course Overview

Code of Conduct

Fraud, Waste, & Abuse

Healthcare Laws

See Something, Say Something

Assessment

Why is the Code of Conduct Important?

A 'code of conduct' is a vital tool for shaping behavior, fostering a positive and ethical culture, and ensuring the well-being and success of individuals and organizations.



Code of Conduct



Code of Conduct

What Shepherd Center is Doing?

Our Commitment: Integrity, Honesty, and Accuracy

Shepherd Center's Code of Conduct explains our organization's commitment to compliance and ethics, all while providing quality care to our patients and support to their families/caregivers and the communities we serve.

- The code of conduct is for everyone at Shepherd Center - staff, doctors, and volunteers. Everyone must know and follow these rules.

'Click' the button to access Shepherd Center's Code of Conduct.

CLICK ME

After reading, close Internet browser to return to module.

Fraud, Waste & Abuse



Why are Fraud, Waste, & Abuse Important?

To ensure that funds provided to Shepherd Center from the federal government are used for their intended purposes, it is important that you understand what Fraud, Waste, and Abuse are. Misuse of materials, goods, or services can have serious impacts for anyone involved in illegal activities.

What Shepherd Center is Doing?

Shepherd Center's policy, "Combating Fraud, Waste & Abuse; Ability to Report Wrongdoing for Federal/Georgia Beneficiaries, [AC.ETH.01.12](#)" specifies its commitment to obey the law and eliminate fraud, waste and abuse when it comes to receiving payments from any organization (specifically including federal and/or state health care programs) for patient care or services.

**Fraud,
Waste, &
Abuse**

Fraud

FRAUD is when someone purposely lies to a health insurance company, Medicaid or Medicare to get money.

Examples of Fraud:

- A doctor provides treatment to a patient that is not covered by the healthcare plan, but when they file the claim, they submit the procedure code for a different covered treatment.
- An employee steals Social Security numbers to create a fake identity or enter false claims for personal gain.



Waste

WASTE is when someone overuses health services carelessly.

Examples of Waste:

- A doctor consistently prescribes a high-cost medication rather than using the generic drug (of which he is not aware).
- An administrator sends paper documents rather than using electronic transfers, causing unnecessary copying, sorting, and handling of the documents.



Abuse

ABUSE happens when best medical practices aren't followed, leading to costs and treatments that aren't needed.

Examples of Abuse:

- A doctor provides a treatment that is not medically necessary and files a claim for payment.
- An employee uses company e-mail to ask for donations to an organization where she volunteers.



What to do if you have questions, issues, or concerns:

- 1. Identify the Issue:** Recognize and understand the nature and extent of the problem.
- 2. Report Concerns:** Report any suspicious or confirmed instances of Fraud, Waste, and Abuse to the appropriate people within Shepherd Center, such as our Compliance Hotline (800-860-0085), your supervisor, or any representative of our Compliance Department
- 3. Seek Guidance:** Consult with appropriate personnel, such as your supervisor or any representative of our Compliance Department for guidance on how to handle the situation effectively and ethically.
- 4. Stay Vigilant:** Maintain awareness and vigilance to prevent future occurrences, and proactively engage in efforts to minimize the risk of fraud, abuse, or waste.

Why are Healthcare Laws Important?

Healthcare Laws are designed to ensure that the Government (and other Insurance payors) are getting what they are paying for. They also focus on ensuring quality and safety. Shepherd Center has a duty to comply with all healthcare laws for all of our operations. Non-compliance can result in major consequences, not only for Shepherd Center, but also for you.

What Shepherd Center is Doing?

Shepherd Center is committed to doing the right thing. We believe that understanding of healthcare laws and consequences results in more compliance.

**Healthcare
Laws**

Healthcare Laws

Anti-Kickback Statute

The **Anti-Kickback Statute (AKS)** is a healthcare fraud and abuse statute that **prohibits** the offer to exchange or actual exchange of remuneration (*defined broadly as anything of value*) for referrals for services that are payable by a federal program, which, in the context of healthcare providers, includes Medicare and Medicaid.



Healthcare Laws

Stark Law

Stark Law is a set of Federal laws that prohibit **physician self-referral**, specifically a referral by a physician of a Medicare or Medicaid patient to an entity for the provision of designated health services (**DHS**) if the physician (or an immediate family member) has a financial relationship with that entity.

DHS Includes:

- Physical Therapy, occupation therapy, and speech-language pathology services
- Radiation therapy services and supplies
- Parenteral and enteral nutrients, equipment, and supplies
- Inpatient and outpatient hospital services
- Prosthetics, orthotics, and prosthetic devices and supplies
- Radiology and certain other imaging services
- Durable medical equipment and supplies
- Outpatient prescription drugs
- Home health services



Healthcare Laws

False Claims Act

The **False Claims Act (FCA)** is a Federal law that puts legal responsibility on persons and companies who defraud governmental programs. It is the federal Government's primary tool in protecting against fraud against the Government.

Actions that may lead to FALSE CLAIMS:



If You Break The Law, There Are Consequences!

Internal Actions

- Verbal Warning/Coaching
- Termination of Contract

Civil Penalties

- Fines up to \$15,000 per service

Criminal Penalties

- Imprisonment

Exclusion

- Excluded from receiving payment from Federal healthcare programs

Why is 'See Something, Say Something' Important?

It encourages individuals to report anything unusual, suspicious, or potentially harmful they observe. This helps ensure safety, security, and prompt action to address potential risks or threats, creating a safer environment at Shepherd Center for everyone.

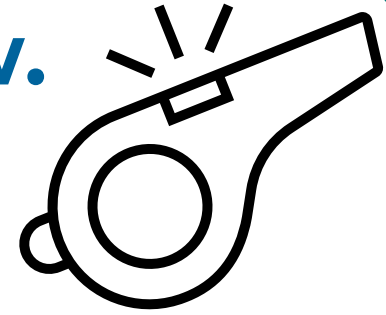
Employees, including management, who commit or condone any form of retaliation will be subject to discipline up to, and including, termination of employment.



**See Something,
Say Something**



Blowing the Whistle: What You Need to know.



Whistleblower

- A whistleblower is a person with evidence of fraud or misconduct who reports it.

Protection

- The False Claims Act (FCA) protects those who report violations from retaliation.

Who can be a Whistleblower?

- Anyone proof of fraud or wrongdoing on part of the company. They are not required to work directly for the company or to witness the fraudulent behavior personally.

Rewarding the Whistleblower

- The FCA may reward whistleblowers for providing information that leads to successful prosecutions or settlements.

Non-Retaliation Environment



Non-Retaliation Environment
Shepherd Center is a **Safe Zone**, a non-retaliation environment. Any form of retaliation against any person who reports a perceived problem or concern in good faith is **strictly prohibited**.

Reporting Misconduct or Violations

1. Your Direct Leader/Supervisor

2. Compliance Department

- 404-350-1281 or 404-350-7737
- Email: compliance@shepherd.org
- Office: 6th Floor in the HIM Department

3. Anonymous Reporting

You are able to submit your report through any of these channels without revealing your identity.

- Hotline: 1-800-860-0085
- Online Intake Form: <https://saysomethingshepherd.ethicspoint.com>
- Mobile Intake Form: QR Code (Scan Above)



IMPORTANT NOTE: You also have the right to report any action that violates a law or other public policy to government regulators.

END OF MODULE TAKE THE ASSESSMENT



Shepherd Center

A Passing Score of 80% or more is
REQUIRED

Click on the button to take your
ASSESSMENT >>>

[Compliance Assessment](#)

*This is a trustworthy file so click
"Ok" on the next prompt!*