



SOUTHERN ILLINOIS HEALTHCARE

Corporate Compliance

Compliance Training 2009 Non-Employee

Training Objectives

- Understand the role of the SIH Compliance Department.
- Understand the purpose of the Corporate Compliance Program.
- Understand your role in compliance.



What is Compliance

- Compliance can be described as conducting a business and oneself in an ethical, moral, and legal manner.
- The SIH Compliance Program has an emphasis on fraud and abuse in the Medicare and Medicaid programs, but also includes other laws, and regulations.
- It is the **RIGHT** thing to do!

Compliance Department

- Not the “Law Enforcer”
- Help our organization remain on the right path, so we can uphold our mission and values.
- Help SIH maintain a moral and ethical culture.
- Checks -n- Balance System for SIH.



Corporate Compliance Program

Internally developed program that promotes ethical and legal business practices. It is designed to prevent, detect, correct and, if necessary, report non-compliant activity to the appropriate Federal and State authorities.



The Code of Ethics

- Uphold the mission, values, and ethics of SIH.
- Continually work to improve the quality of patient care.
- Adhere to open and honest business practices.
- Report ethical and compliance violations

SIH Compliance Helpline

You have questions . . .
we'll get answers!

1.800.965.4583

or

618.529.2540

**The Helpline is available 24 hours a day, 7 days a week.
Call with a question, complaint, or to report a potential
compliance violation. All calls are confidential.
SIH has a non-retaliation policy.**

False Claims Act (SY-CO-019)

- Law has existed since the Civil War.
- Fights fraudulent, abusive or false claims, including those submitted to the Medicare and Medicaid programs.
- Illinois has a false claims act entitled, ***Whistleblower Reward and Protection Act***. It encourages employees with knowledge of compliance issues to come forward.
- SIH has implemented a False Claims Act Policy to inform our employees.

Audit Activities

- **Compliance Auditors** conduct audits to identify errors and opportunities for improvement.
- **Internal Auditor** audits SIH practices for efficiency and effectiveness of operations.
- **Nurse Auditors** audit patient records to confirm appropriate charges based on documentation.

Internal Monitoring and Auditing

- Scheduled audits (based on Compliance Annual Work Plan).
- Audits pursuant to Helpline investigations.
- Audits requested by staff or management.
- Audits requested by investigative/government agencies (self audits).
- Helps to minimize the risks of non-compliance with the Federal and State regulations.

Response to Detected Deficiencies

- Once an issue is discovered, it must be investigated.
- Once investigated and confirmed, the issue must be corrected and any overpayment refunded.
- Once corrected, a follow-up review must be conducted.

Your Responsibility. . .

- Perform job duties in an ethical and compliant manner.
- Adhere to all policies and procedures.
- Report potential violations of policies or Code of Ethics.
- Cooperate with the Compliance Department during investigations and audits.
- *Ask questions.*

IMPORTANT

The ultimate responsibility for compliance depends on each individual within the organization.



Questions

