

Management Responsibility with the Ethics in Business Program  
POLICY: AC.ETH.01.05

Date: June, 1999

Responsible to: President & CEO

**PURPOSE:**

To provide written guidelines to the Management Staff on their responsibility in the operation of Shepherd Center and Affiliates Ethics in Business Program.

**POLICY:**

Shepherd Center and Affiliates will comply with requirements established by Congress for the Health Care Fraud and Abuse Data Collection Program. Shepherd management will ensure and oversee that staff under their supervision will utilize available means to prevent, detect and correct any instances of fraud, waste or abuse within the scope of their services.

**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 and Affiliates Management will:

1. Support the Ethics in Business Program on fraud, waste, and abuse.
2. Develop (as requested) written standards of conduct, policies and procedures that address specific areas of potential fraud, waste and/or abuse in their department/service/program.
3. Develop or assist in the development of effective internal controls and monitoring to identify, correct and prevent fraudulent activities within their scope of responsibility.
4. Include in the evaluation process of their employees adherence to compliance and the Ethics in Business Program.

5. Oversee and monitor the proper documentation of all activities for billing purposes.
6. Establish internal controls to ensure proper accounting of all patient charges, independent contracts, etc. that could affect reimbursement from third-party payors.
7. Provide their personnel effective education and training programs on an ongoing basis to ensure that they are knowledgeable about compliance and Shepherd's Ethics in Business Program.
8. Provide their personnel with appropriate guidance in the prevention, detection and resolution of instances of conduct that do not conform to federal and state laws or the Ethics in Business Program.
9. Include compliance risk areas for their department/service/program in written policies and procedures and training provided to their employees.
10. Properly display compliance "Hotline" phone numbers within their area of responsibility.
11. Provide a mechanism for furnishing and disseminating information and guidance on federal and state statutes, regulations and other requirements to their personnel.
12. Ensure that their personnel are knowledgeable on reporting suspected fraud, waste and abuse violations without the fear of retaliation.
13. Ensure that policies and procedures are established pertaining to documentation (creation, distribution, retention, storage, retrieval, destruction, etc.) within their department / service / program.
14. Provide their employees with the established disciplinary standards for improper conduct to ensure consistent application and enforcement of the standards throughout Shepherd Center Affiliates.

Joint Function: ,

Joint Category: ,

Joint Standard: ,

Reference text: