

# Management Responsibility with the Business Ethics & Compliance Program

## PURPOSE:

To provide written guidelines to Shepherd Center management staff on their responsibility in the operation of Shepherd Center's Business Ethics 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. As such, Shepherd Center 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 Center management will:

1. Support the Business Ethics Program, particularly as it relates to the identification, correction and prevention of fraud, waste and abuse.
2. Develop or assist in the development of written standards of conduct, policies and procedures that address specific areas of potential fraud, waste and 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, wasteful or abusive activities within their scope of responsibility.
4. Include in the evaluation process of their employee's adherence to compliance and the Business Ethics 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 Center's Business Ethics 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 Business Ethics Program.
9. Properly display compliance posters with "Compliance Hotline" phone numbers and other related contact information within their area(s) of responsibility.
10. Provide a mechanism for furnishing and disseminating information and guidance on Federal

and state statues, regulations and other requirements to their personnel.

11. Ensure that their personnel are knowledgeable on reporting suspected fraud, waste and abuse violations without the fear of retaliation.
12. Ensure that policies and procedures are established pertaining to documentation (creation, distribution, retention, storage, retrieval, destruction, etc.) within their department/service/program.
13. Provide their employees with the established corrective action plans for improper conduct to ensure consistent application and enforcement of the standards throughout Shepherd Center.