

Employee Responsibility with the Ethics in Business Program
POLICY: AC.ETH.01.06

Date: June, 1999

Responsible to: President/CEO

PURPOSE:

To provide written guidelines to all employees 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 employees will utilize available means to prevent, detect and correct 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 and Affiliates Employees will:

1. Support the Ethics in Business Program on fraud, waste, and abuse.
2. Follow department/program internal controls developed pertaining to Shepherd Center & Affiliates Ethics in Business Program.
3. Assist in maintaining proper documentation for billing purposes.
4. Follow 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 or the Ethics in Business Program.

6. Assist their department/program in the daily operation of the Ethics in Business Program.
7. Review annually the Ethical Conduct policy established by Shepherd Center.
8. Be familiar with the objectives of the Ethics in Business Program.
9. Identify potential or questionable business practices to supervisory personnel.
10. All employees are expected to alert Human Resources immediately if they feel they are in a conflict of interest with Shepherd Center.
11. Report suspected fraud, waste or abuse to:
 - a. Immediate Supervisor
 - b. Chief Compliance Officer
 - c. 24-hour Hotline

Note: The employee may remain anonymous when reporting incidents of fraud, waste or abuse. If the individual does identify him/herself, confidentiality may be requested as well as the individual may request feedback on the corrective action(s) taken.