



Coffee Regional Medical Center

COMPLIANCE PROGRAM MANUAL

Promoting Ethical Excellence.



A MESSAGE FROM OUR CEO

We are very happy to be part of a dedicated team of caregivers, physicians and leaders. If you have just joined our team, every one of us looks forward to working with you. For our established team members, thank you for your continued dedication to our mission and purpose.

We foster a culture that is designed to promote trust, assure compliance, inspire exceptional performance and bring out the genius in each of our employees. We strive to create a work environment that instills a sense of dignity, pride and satisfaction among our staff so that we can provide the very best care to our patients. Our desire to make a difference in the lives of those we serve is a central part of our daily work. We believe that it is only through the dedication and determination of our caregivers that we can serve our customers – our patients and their families. In your daily work you can see first-hand how you along with your colleagues and our physicians exemplify their roles as outstanding caregivers focused on the very best care and a great patient experience. Working together we will accomplish so much, including making a difference in the lives of our patients by helping them achieve their wellness goals to both stay well and live well.

Importantly, you will see details about our Compliance Program and the Code of Conduct in this document, both of which guide our work and actions. These guidelines are the principles and values intended to set the expected conduct of our organization's operations. We care for our patients in small ways and big ways – but always exceptionally and in a compliant and ethical manner. I am counting on each of you to be part of these ongoing efforts. Please accept my thanks for being part of our important work.

Live well,

Vicki Lewis



OUR PURPOSE

To Serve. To Heal. To Save.

OUR VISION

Healthy Lifestyles. Better Lives.

OUR MISSION

To Provide Exceptional Care and Wellness Close to Home.

OUR VALUES

- Trust
- Partnership
- Connection
- Knowledge
- Excellence
- Service

OUR COMPLIANCE PROGRAM

The mission of Coffee Regional Medical Center ("CRMC") is to provide exceptional care and wellness close to home. In furtherance of this mission, CRMC is fully committed to establishing a culture that values compliance from the top down and promotes compliance from the bottom up. Accordingly, CRMC has established and implemented a comprehensive Compliance Program that is specifically designed to promote the prevention, detection, and resolution of instances of conduct that do not conform to applicable federal, state, and local laws, government regulations, and/or CRMC's own ethical and business policies. CRMC's Compliance Program is purposefully structured around the following seven fundamental elements that have been identified by the U.S. Department of Health and Human Services, Office of Inspector General ("OIG"), as being fundamental to an effective hospital Compliance Program.

1. Designation of a Compliance Officer and a Compliance Committee^[1]

CRMC's Board of Directors appointed Kaycee Hopwood as the organization's Compliance Officer in September of 2019. Ms. Hopwood reports directly to Vicki Lewis, CRMC's President and Chief Executive Officer, and she supports the oversight of the Compliance Program through reporting on a regular basis directly to the CRMC Board of Directors (no less than annually) on the progress of the implementation and operation of the Compliance Program. CRMC has also established a Compliance Committee to advise the Compliance Officer and to assist in the operation of the Compliance Program. The Compliance Committee is comprised of trained representatives from each of the relevant functional departments of CRMC, and it meets on a quarterly basis.

2. Implementation of Standards of Conduct and Written Policies and Procedures^[2]

With the help of CRMC's Board of Directors, members of the Senior Leadership Team and the Corporate Compliance Committee, representatives from the medical and clinical staffs, and other personnel from various levels of CRMC's organizational structure, CRMC has developed and adopted an updated Code of Conduct to help guide CRMC's activities. In addition, under the direction and supervision of CRMC's Compliance Officer and Compliance Committee, CRMC has developed written compliance policies and procedures addressing identified areas of risk to CRMC, in order to establish bright-line rules to help CRMC workforce members carry out their job functions in a manner that ensures compliance with Federal health care program requirements and furthers CRMC's mission.

[1] For more information, see CRMC Compliance Policy titled "Designation of Compliance Officer and Compliance Committee."

[2] For more information, see CRMC Compliance Policy titled "Implementation of Written Policies, Procedures, and Standards of Conduct."

3. Maintaining Effective Lines of Communication^[3]

CRMC recognizes that clear and open lines of communication to the Compliance Officer are particularly important to the success of its Compliance Program. Accordingly, CRMC has established a Compliance Hotline as an avenue by which workforce members, contractors/vendors, patients, and visitors may report potential compliance issues and/or seek clarification in the event of any confusion or question regarding a statute, regulation, or hospital compliance-related policy. CRMC also utilizes the Symplr Event Reporting System, which allows workforce members to electronically report compliance-related events immediately after they arise. Reports/inquiries can be made via the Compliance Hotline and/or the Symplr Event Reporting System on an anonymous basis, 24 hours a day, 7 days a week, 365 days a year.

4. Conducting Effective Training and Education^[4]

Under the direction of CRMC's Compliance Officer and Compliance Committee, CRMC, through its Education Manager, provides general compliance training that educates all of its workforce members on the key elements of CRMC's compliance program, the principles set forth in its Code of Conduct, its written compliance policies and procedures, and areas of special concern that have been identified by the OIG. CRMC's workforce members receive this compliance training at orientation, and thereafter as part of CRMC's annual HealthStream education. In addition, CRMC also provides targeted training to workforce members whose actions affect the accuracy of the claims submitted to the Government, such as those involved in the coding, billing, and cost reporting processes. Attendance and participation in CRMC's compliance-related training are mandatory conditions of continued employment and are tracked by CRMC's Education Manager. Adherence to the requirements of CRMC's compliance-related training is a factor in the annual evaluation of each workforce member. The Compliance Officer evaluates the content of the compliance training on an annual basis to ensure that the content is appropriate. In addition, CRMC's Board of Directors is provided compliance-related training on an annual basis.

5. Conducting Internal Monitoring and Auditing^[5]

During the fourth quarter of every fiscal year, CRMC's Compliance Committee conducts an annual compliance risk assessment to identify the compliance risks that are inherent to CRMC's operations. The Compliance Committee prioritizes/ranks the risks according to likelihood of occurrence and potential impact, identifies the mitigation strategies that are currently in place for the identified and prioritized risks, sorts the identified and prioritized risks from highest to lowest, and develops and implements an annual audit plan for the next fiscal year.

[3] For more information, see CRMC Compliance Policy titled "Compliance Hotline Policy."

[4] For more information, see CRMC Compliance Policy titled "Compliance Training and Education."

[5] For more information, see CRMC Compliance Policy titled "Compliance Auditing and Monitoring."

6. Enforcing Standards Through Well-Publicized Disciplinary Guidelines^[6]

CRMC recently updated its organizational Disciplinary Procedures Policy. This policy promotes application of progressive discipline using graduated steps to address/modify unacceptable performance or conduct, while permitting discipline to begin at a higher level depending on severity and circumstances. It also expressly requires that discipline be applied in a fair and consistent manner and that it be proportionate to the magnitude of the offense.

7. Responding Promptly to Detected Offenses and Undertaking Corrective Action^[7]

Upon receipt of reports or reasonable indications of suspected noncompliance, either CRMC's Compliance Officer or other members of Senior Leadership will promptly initiate steps to investigate the questionable conduct to determine whether a material violation of applicable law or the requirements of the Compliance Program has occurred, and if so, take steps to correct the problem. CRMC will consistently respond to detected deficiencies by promptly and thoroughly investigating said matters, as well as by developing corrective action plans that examine the root causes of each violation.

[6] For more information, see CRMC Human Resources Policy titled "Rules of Conduct/Disciplinary Procedures"

[7] For more information, see CRMC HR Policy titled "Responding to Detected Offenses and Developing Corrective Action Initiatives."

CODE OF CONDUCT

An integral part of CRMC's Compliance Program is our Code of Conduct, which consists of the following core set of ethical and compliance principles and values that are intended to help guide the organization's operations.

I. We provide quality healthcare services



The good physician treats the disease; the great physician treats the patient who has the disease. ~William Osler

At CRMC, we are truly dedicated to providing all of our patients with high-quality, patient-centered care that is reasonable, necessary, and safe. In fact, it is our number one priority, and serves as the cornerstone of our mission, which is to provide exceptional care and wellness close to home. We make every effort to keep our patients safe at all times, and we have even earned full accreditation with NIAHO®, a quality-based hospital accreditation program from DNV, which means that we officially meet or exceed patient safety standards set forth by the U.S. Centers for Medicare and Medicaid Services. In addition to providing excellent care, we also strive to treat every patient who walks through our doors with the kindness, compassion, dignity, and respect that they deserve. Our goal is to treat our patients like we would want our own family members to be treated. After all, it is our honor and privilege to treat them. We do not discriminate against or treat differently any patient on the basis of race, color, national origin, age, religion, sex, or disability, and we provide the same level of care to every single patient, regardless of their ability to pay. We also value patient autonomy and respect the rights of our patients to be involved in all aspects of their care. We always endeavor to provide clear, accurate, and thorough information to our patients so that they can make informed health care decisions. Last but not least, we are respectful of our patients' time and we do our very best to avoid waits whenever possible.

II. We exemplify ethical behavior



In any moment of decision, the best thing you can do is the right thing. The worst thing you can do is nothing. ~Theodore Roosevelt

CRMC is devoted to fostering an ethical workplace culture. At CRMC, our workforce members are expected to act with honesty and integrity at all times. This means always doing what is right (even when no one else is watching) and reporting what is wrong (even when it is difficult).

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We are fully dedicated to compliance with all applicable laws, rules, and regulations. We do not employ, contract with, or grant privileges to individuals or entities who have been excluded from federal healthcare programs, and we perform monthly screenings against the required government exclusion lists to ensure compliance in this regard. We promptly investigate any and all reports of noncompliant behavior, and we take appropriate steps to address and remedy any confirmed noncompliance. As in any workplace setting, mistakes are bound to happen, and if and when they do, our workforce members are encouraged to always assume ownership of and take accountability for their actions.

III. We promote organizational professionalism



Professional is not a label you give yourself - it's a description you hope others will apply to you. ~David Maister

CRMC is dedicated to cultivating professionalism throughout our organization. At CRMC, we value collaboration and teamwork, as we recognize that working together increases productivity and efficiency, improves continuity of care and patient outcomes, and boosts morale for our patients, visitors, and workforce members. We expect our workforce members to exhibit a strong work ethic, which requires them to put their best foot forward every single day and to show true dedication to their jobs. We also emphasize dependability, which means that workforce members must consistently show up to work on time, be responsive to others, and fulfill their commitments. Most importantly, our workforce members are expected to always show respect for their co-workers, as well as for our patients and visitors. This includes engaging in active and attentive listening, practicing patience (even when it is challenging), and being considerate of differing opinions. We encourage our workforce members to always endeavor to keep positive attitudes, and to exemplify signs of kindness, courtesy, and gratitude by practicing simple, yet impactful, actions such as smiling, holding the door open, and saying "please" and "thank you."

IV. We foster a safe, healthy, and productive work environment



The greatest asset of a company is its people. ~Jorge Paulo Lemann

At CRMC, our workforce members are essential to our purpose, our vision, and our mission, and we are committed to cultivating a positive work environment for everyone on our team. We treat each other with dignity, fairness, and respect, in both agreement and disagreement. We promote equal opportunity, diversity, and inclusion at all levels of the organization. We recognize that every single person on our team brings different talents, skills, and experiences to the table, and that this only makes us better as a healthcare organization. We only hire and promote based on merit, qualifications, and job performance, and we do not discriminate in our employment practices. We have zero tolerance for any type of unlawful harassment or aggressive behavior.

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We comply with OSHA and other laws and regulations intended to ensure the health, safety, and welfare of our workforce members, and we encourage the reporting of unhealthy or unsafe working conditions without any fear of retaliation. We also offer an Employee Assistance Program to all of our employees and their dependents, which provides a variety of helpful resources, including emotional wellbeing, financial, and legal services.

V. We submit accurate claims and information



I was brought up to believe that the only thing worth doing was to add to the sum of accurate information in the world. ~Margaret Mead

CRMC is committed to ensuring that all claims, reimbursement requests, and supporting documentation are complete and accurate and reflect reasonable and necessary services rendered by an appropriately licensed medical provider. We strive to ensure that everyone who performs coding or billing services for CRMC receives the necessary education and training. We continuously evaluate our coding and billing activities to make sure that they conform with applicable laws and third party payer requirements and to identify potential areas for improvement. We promptly detect, disclose, and return any identified overpayments.

VI. We protect confidential and sensitive information



Trust matters in health care. It makes patients feel less vulnerable, clinicians feel more effective, and reduces the imbalances of information by improving the flow of information. ~Thomas H. Lee, MD

CRMC is truly committed to maintaining the privacy and security of our patients' protected health information, in any form or media (whether electronic, paper, or oral), in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH), and our own internal policies and procedures. This is our ethical and legal obligation as a healthcare provider, and it is also our patients' expectation. CRMC workforce members with access to patients' protected health information are only allowed to access, use, or disclose that information when it is required for them to perform their daily jobs. Our workforce members receive comprehensive training at orientation, and thereafter on an annual basis, on their duty to safeguard the confidentiality of patients' protected health information. Our responsibility in this regard is so important to us that we have also implemented a state of the art patient privacy monitoring solution to perform automated audits of all accesses to our Electronic Medical Record to ensure that all such accesses are appropriate. Workforce members who inappropriately access, use, or disclose protected health information will be subject to disciplinary action, up to and including termination. In addition to protecting our patients' protected health information, we also have measures in place to safeguard our workforce members' sensitive personal information (i.e. compensation and disciplinary records) and our organization's proprietary business information.

VII. We are a responsible nonprofit tax-exempt organization



Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has.

~ Margaret Mead

CRMC is a nonprofit corporation that qualifies as tax-exempt under Section 501(c)(3) of the Internal Revenue Code because of its charitable purposes, which include the provision of health care services to patients in Coffee County regardless of their ability to pay. In order to maintain its tax-exempt status, CRMC operates to promote the public good (rather than the private or personal interests of any individual or entity), only pays fair market value for goods and services, accurately reports payments to the appropriate taxing authorities, and files all tax information and cost reports in accordance with applicable laws. Here at CRMC, we are also dedicated to acting as responsible stewards of our organization's healthcare resources by using them responsibly, efficiently, and in furtherance of our mission, so that our organization will not only survive, but thrive.

VIII. We avoid conflicts of interest



After overcoming the conflict of interest, one can realize and understand the public interest; it builds and reaches the plan of welfare action.

~Ehsan Sehgal

At CRMC, we are committed to protecting our reputation as an honest and respected healthcare provider. In furtherance thereof, we always strive to perform our work objectively and to act in the best interest of the organization and the people in the communities we serve. That means that we must do our very best to avoid all activities that create an actual or perceived conflict of interest with CRMC. In an effort to avoid, minimize, and manage conflicts of interest, certain individuals with decision making authority at CRMC, such as corporate directors, members of senior leadership, members of the medical staff, members of the compliance and procurement departments, and members of committees with board-delegated powers, are required to complete and submit a Conflict and Disclosure of Interest Questionnaire on an annual basis. If and when conflicts of interest arise, CRMC works diligently to reduce, manage, and eliminate the conflicts.

IX. We comply with laws and regulations



The biggest corporation, like the humblest private citizen, must be held to strict compliance with the will of the people as expressed in the fundamental law. ~ Theodore Roosevelt

CRMC is dedicated to conducting its healthcare operations in full compliance with all applicable federal, state, and local laws, rules, and regulations, with an emphasis on preventing fraud, abuse, and waste. Below are brief summaries of several key healthcare laws, and what we do at CRMC to ensure compliance with those laws.

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- **Anti-Kickback Statute**

The Anti-Kickback Statute ("AKS") is a federal criminal statute that makes it a felony to knowingly and willfully offer or pay (or solicit or receive) any "remuneration" to induce (or in return for) the referral, arranging for, or recommendation of business for which payment may be made by a federal or state health care program (e.g., Medicare, Medicaid, TRICARE/CHAPUS). "Remuneration" includes anything of value, and can take many different forms besides cash, such as excessive compensation or paying for expensive hotels and meals. At CRMC, we do not ask for, accept, pay, or even offer to pay, anything of value, either directly or indirectly, in exchange for patient referrals or otherwise in violation of the Anti-Kickback Statute.

- **Physician Self-Referral Law**

The Physician Self-Referral Law ("Stark Law") is a federal law that prohibits a physician from making referrals for certain designated health services payable by Medicare to an entity with which the physician or the physician's immediate family member has a financial relationship. At CRMC, our physicians are prohibited from referring Medicare beneficiaries to any entity for the provision of designated health services if the physician, or the physician's immediate family member, has a financial relationship with the entity, unless an applicable Stark Law exception to that financial relationship is satisfied.

- **False Claims Act**

The False Claims Act ("FCA") is a federal law that imposes liability on persons and companies who defraud governmental programs by knowingly submitting or causing the submission of false or fraudulent claims for payment. Examples of FCA violations may include upcoding and unbundling procedures, filing multiple claims for the same procedure, and billing for medically unnecessary procedures. At CRMC, we only file claims for services that were actually rendered, and we do so appropriately. We do not submit claims to the federal government that are known to be false.

- **Emergency Medical Treatment and Labor Act**

The Emergency Medical Treatment and Labor Act ("EMTALA") is a federal law that was enacted to ensure public access to emergency medical services regardless of ability to pay. When a person comes into our Emergency Department, we comply with EMTALA by conducting an emergency medical screening examination, and if an emergency medical condition exists, we provide stabilizing treatment. We do not delay the performance of a medical screening examination or stabilizing treatment to inquire about payment. Patients with emergency medical conditions are only transferred to another facility at the patient's request or if we are unable to treat the patient due to capacity or ability.

X. We report compliance concerns without fear of retaliation



Change starts with YOU. When you step up, you invite others to step up, too. ~ Mandy Hale

Every single member of CRMC's workforce has an affirmative duty to report, in good faith, suspected or potential compliance issues. Failure to report a compliance issue may be grounds for disciplinary action. We will not take adverse action against any CRMC workforce member who participates in good faith in CRMC's Compliance Program by reporting suspected or potential compliance issues, even if we ultimately determine that no violation actually occurred.

Promoting Ethical Excellence.

CONTACT US WITH COMPLIANCE CONCERNS

If you have any questions regarding CRMC's Compliance Program or the Code of Conduct, please contact CRMC's Compliance Officer, Kaycee Hopwood.

If you wish to anonymously report a compliance concern, you may also call our Compliance Hotline at (912) 384-0292 or use Symplyr, our event reporting system, which allows CRMC workforce members to report concerns electronically.



Kaycee W. Hopwood
Compliance Officer

- *Phone*

 1.912.383.5621

- *Email*

 Kaycee.Hopwood@CoffeeRegional.org

- *Compliance Hotline*

 1.912.384.0292

