

HARBOR-UCLA MEDICAL CENTER

SUBJECT: COMPLIANCE PROGRAM/CODE OF CONDUCT

POLICY NO. 802

PURPOSE:

To define the requirements of the Harbor-UCLA Medical Center’s Compliance Program.

POLICY:

Harbor-UCLA Medical Center’s Compliance Program is a comprehensive strategy to prevent, detect and correct instances of unethical or illegal conduct. Under the direction of the Compliance Officer, Harbor-UCLA will continue to develop, assess, and refine the Compliance Program to ensure its effectiveness.

PROCEDURE:

The Compliance Program consists of the following elements:

- I. A Compliance Officer is responsible for implementing and monitoring the compliance program.
- II. A Code of Conduct, as well as compliance policies and procedures.
- III. Education and training programs for all affected workforce members.
- IV. Effective lines of communication, including a hotline to receive complaints.
- V. A system to respond to allegations of improper/illegal activities and to develop effective corrective action plans, as necessary.
- VI. Auditing and other evaluation techniques to monitor and ensure compliance.
- VII. Enforcing standards consistently through appropriate disciplinary action.

The overall goal of the Compliance Program is to ensure that all workforce members comply with applicable laws, regulations, and standards. A primary focus is on laws that govern health care business practices, and on adherence to government and private health plan requirements.

I. Compliance Officer and Compliance Committee

The Compliance Officer is responsible for overseeing the Harbor-UCLA Compliance Program and implementing compliance-related activities. The Harbor-UCLA Compliance Officer will participate on the Department of Health Services’ (DHS) Compliance Committee, which reviews system-wide

EFFECTIVE DATE: 8/07

SUPERSEDES:

REVISED: 1/11, 1/15, 1/18

REVIEWED: 11/11, 1/15, 1/18

REVIEWED COMMITTEE:

APPROVED BY: _____

Kim McKenzie, RN, MSN, CPHQ
Chief Executive Officer

Anish Mahajan, MD
Chief Medical Officer

Patricia Soltero Sanchez, RN, BSN, MAOM
Chief Nursing Officer

Signature(s) on File.

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compliance activities, determines areas of risk, identifies annual areas of review, and evaluates results of auditing and monitoring activities.

II. Code of Conduct

The DHS Code of Conduct provides guidance to workforce members on the basic standards and principles under which DHS and Harbor-UCLA conduct business. Each workforce member has a personal responsibility to comply with the laws, regulations, policies, and the Code of Conduct, applicable to his/her job functions, as well as to report any activity that appears to violate these laws, regulations, policies or the Code of Conduct.

All workforce members should receive the Code of Conduct at the start of service and complete the Compliance Awareness Training (discussed in Section III below). Each workforce member will sign an acknowledgement stating that s/he will abide by the Code of Conduct as it relates to his/her job responsibilities and that s/he understands that non-compliance with the Code of Conduct can result in disciplinary action up to, and including, discharge from service.

III. Education and Training

All workforce members are required to receive Compliance Awareness Training within/during initial new employee orientation and at least every two years thereafter. This training is intended to enhance workforce members' understanding of the Compliance Program and Code of Conduct. The training will make workforce members aware of compliance issues they may encounter and discuss their role in the Compliance Program.

Additionally, compliance-related education on various topics (e.g., coding, billing, HIPAA, etc.) will be provided on an episodic and as-needed basis.

IV. Effective Lines of Communication, Including a Hotline to Receive Complaints

As outlined in the DHS Code of Conduct, there are several resources workforce members can use to obtain guidance on ethics or compliance issues or to report a suspected violation. These resources include his/her supervisor or manager, the Harbor-UCLA Compliance Officer, or the DHS Compliance Hotline.

The DHS Compliance Hotline is a toll-free number managed by the DHS Audit and Compliance Division that workforce members may call to report a suspected violation of law, regulation, or policy. Every attempt will be made to maintain the reporter's confidentiality, within the limits of the law and the practical necessities of conducting the investigation. Due to these limitations, confidentiality cannot be guaranteed. Callers to the Hotline may choose to remain anonymous. The DHS Compliance Hotline is operated simultaneously with the Los Angeles County Fraud Hotline, which is managed by the Auditor-Controller.

Non-Retaliation

Harbor-UCLA will not retaliate against anyone who reports a suspected violation in good faith. Workforce members are protected from retaliation by County Code Section 5.02.060, as well as by the State of California and federal "whistle-blower" protections.

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V. System to Respond to Allegations of Improper/Illegal Activities and to Develop Effective Corrective Action Plans, as Necessary

All reports of alleged improper/illegal activities will be investigated by either Harbor-UCLA or DHS, in accordance with established policy, to determine their validity. All reports of alleged misconduct will be treated seriously and appropriately.

Generally, suspected compliance violations that may result in an inappropriate claim for payment, or that may have an unknown extent or consequence, will be investigated by the DHS Audit and Compliance Division, in consultation with Harbor-UCLA. In appropriate situations, these cases may be referred for investigation to County Counsel, the Office of County Investigations, or other appropriate entity.

Records of the nature and results of any investigation conducted will be maintained by the Compliance Officer and Audit and Compliance Division. A report of the result of the investigation and recommended corrective actions (e.g., disciplinary actions, operational changes, self-disclosures, etc.) will be forwarded to the appropriate manager.

VI. Auditing and Other Evaluation Techniques to Monitor and Ensure Compliance

The Compliance Officer will participate in the periodic DHS risk assessments that are conducted by the Audit and Compliance Division. In addition, Harbor-UCLA monitors for compliance in various areas, as part of its ongoing management and oversight activities.

VII. Enforcing Standards Consistently Through Appropriate Disciplinary Action

Where there are violations of law, regulation or policy, particularly those relating to health care business practices, Harbor-UCLA will ensure that appropriate disciplinary action is taken in accordance with the DHS Employee Evaluation and Discipline Guidelines.

AUTHORITY: Department of Health and Human Services, Office of the Inspector General,
Compliance Program Guidance
Deficit Reduction Act of 2005
County Code Section 5.02.060

REFERENCES: DHS Policy 1000 DHS Compliance Program/Code of Conduct
DHS Employee Evaluation and Discipline Guidelines
DHS Code of Conduct
DHS Policy 301.2 Reporting Fraud and Suspected Misconduct