



**By the end of this lesson,
you should be able to describe:**

- Trinity Health's Integrity and Compliance Program
- Key areas in Trinity Health's Code of Conduct
- Your responsibilities to support the Integrity and Compliance Program
- Resources available to answer questions or to report issues and concerns





Message From Leadership

Richard J. Gilfillan, M.D.
President and CEO, Trinity Health

Integrity and Compliance Program

The Integrity and Compliance Program is Trinity Health's system-wide compliance program.



adequate systems a
laws, regulations a
Compliance pract
and standards, s
safety and securi

Integrity and Compliance Program

Our Integrity and Compliance Program helps us to:

- Understand and follow the laws, regulations and professional standards that apply to our work
- Prevent, detect and correct integrity and compliance problems that may arise in our operations

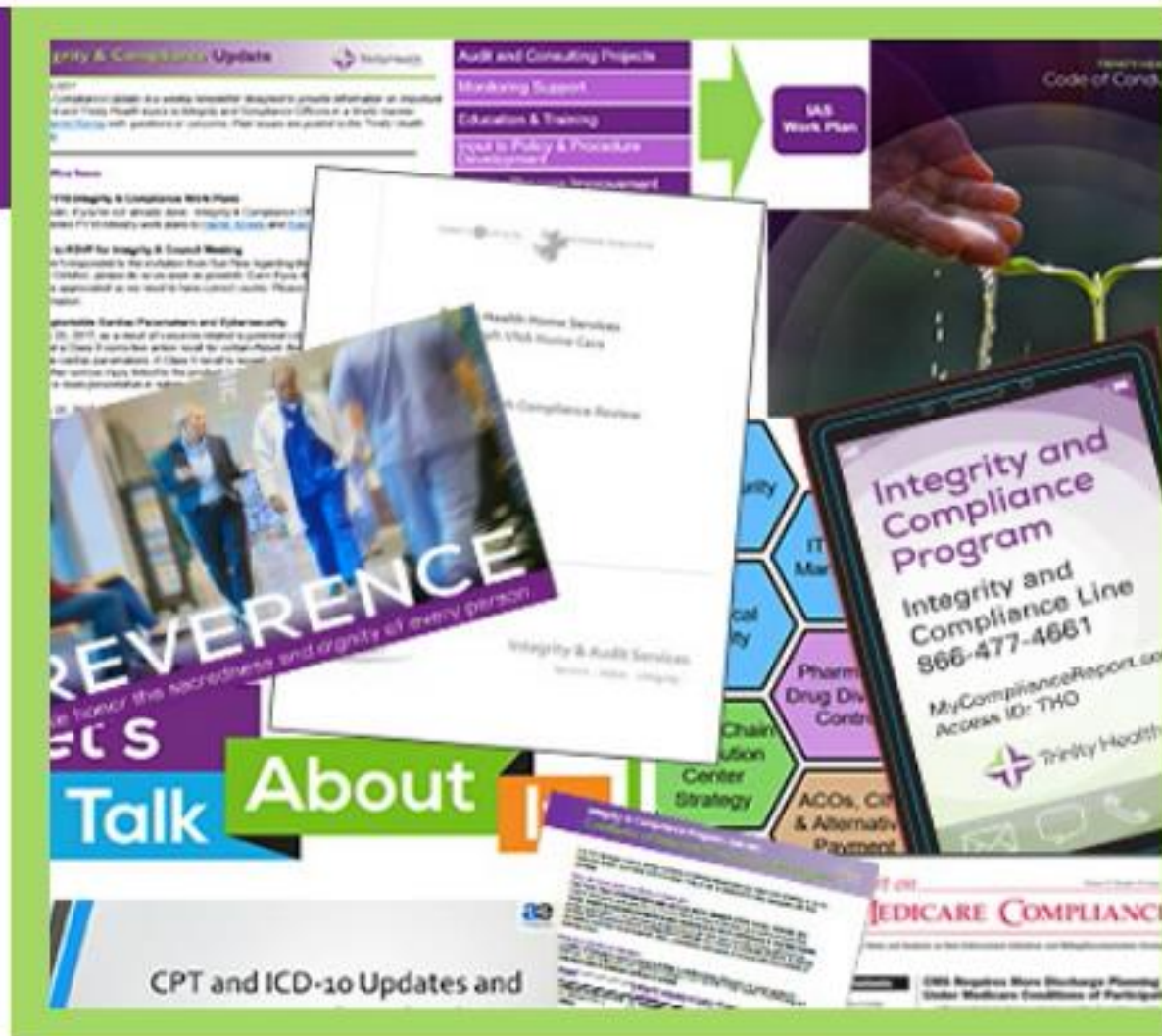


adequate systems a
laws, regulations a
Compliance pract
and standards, s
safety and secur

Integrity and Compliance Program

The program:

- Provides resources and tools to answer questions or to report issues and concerns



Integrity and Compliance Program

The program:

- Provides resources and tools to answer questions or to report issues and concerns
- Assists us in delivering better health, better care at lower costs for patients, residents, and others we serve





Actions

Resources to answer questions or to report issues and concerns, including your Integrity & Compliance Officer and the Integrity & Compliance Line.

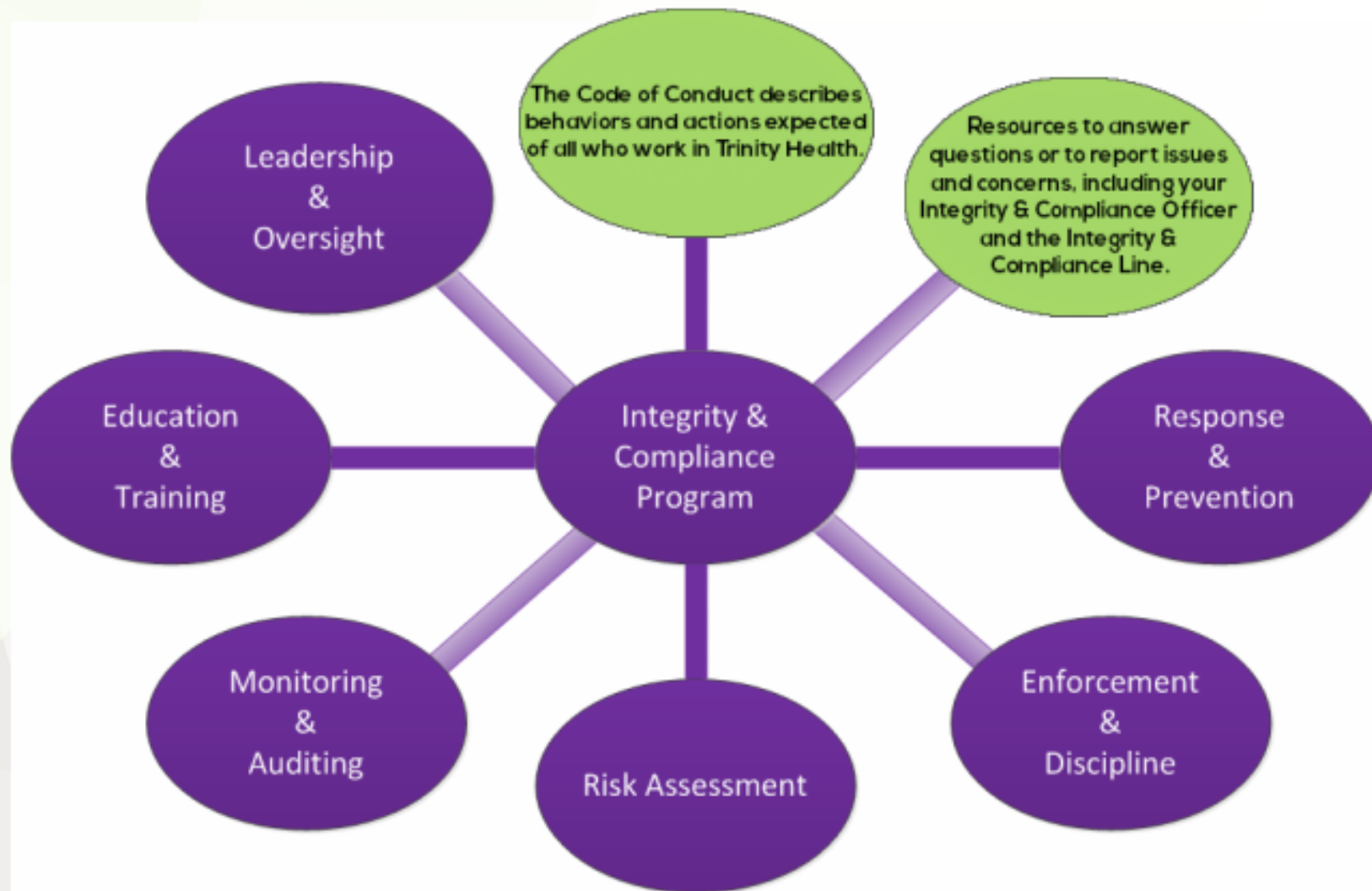
Drag each action to the correct element



Actions

The Code of Conduct describes behaviors and actions expected of all who work in Trinity Health.

Drag each action to the correct element



Actions



Drag each action to the correct element



Actions

Providing training programs to assist colleagues in understanding the laws and regulations that apply to their work.

Drag each action to the correct element

Actions

Monitoring changes in laws and regulations and risks to our operations on a regular basis.

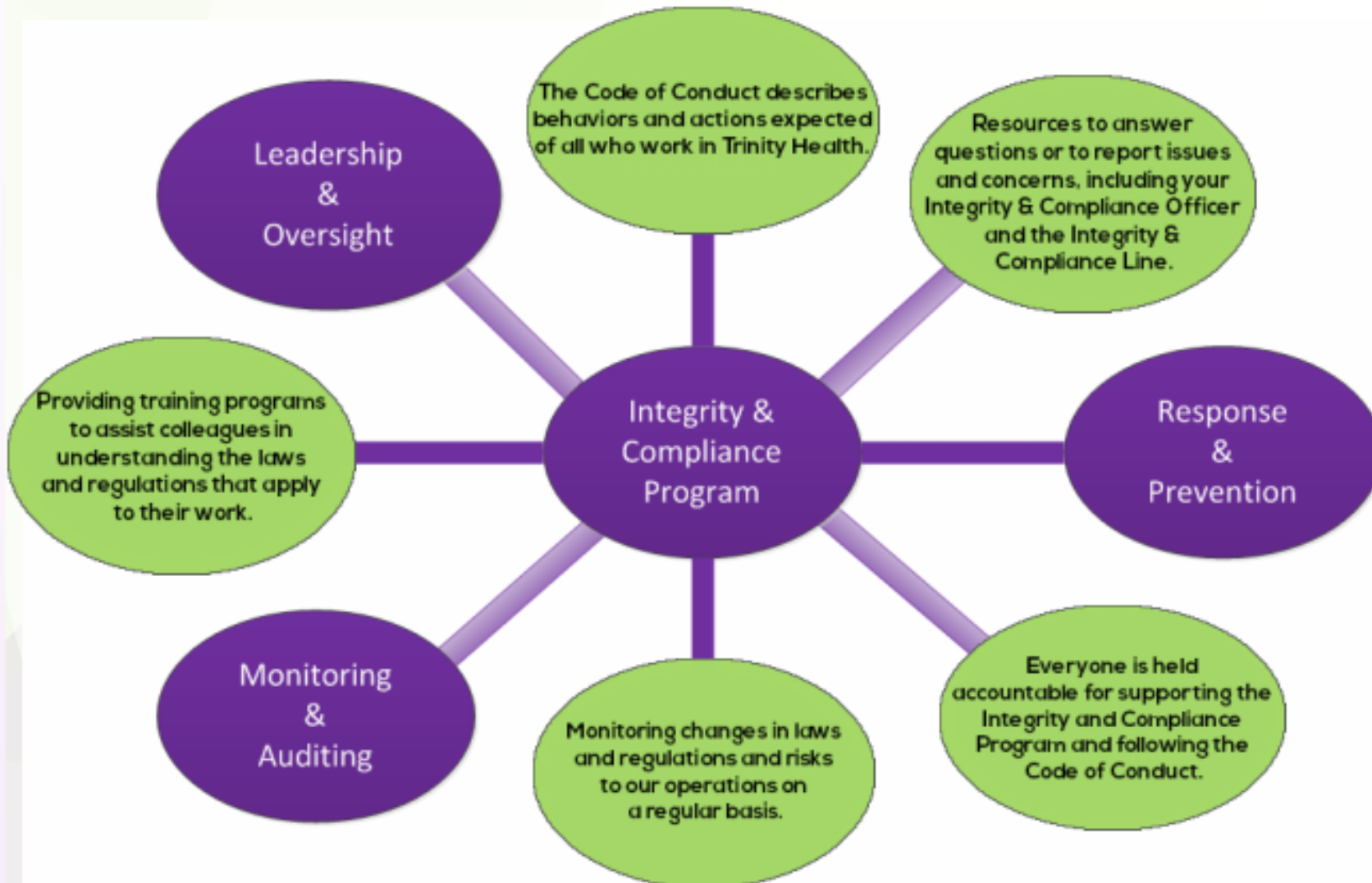
Drag each action to the correct element

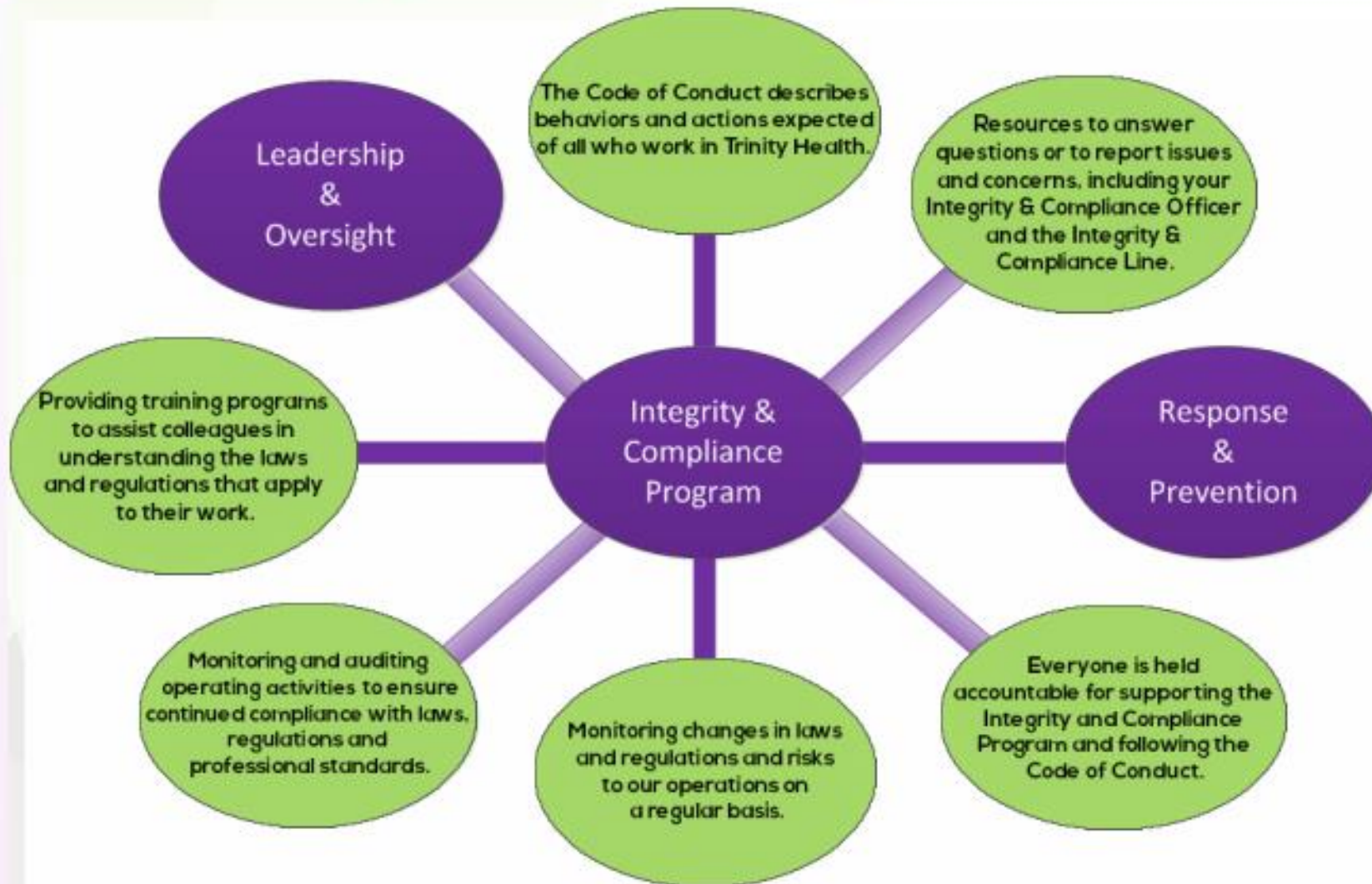


Actions



Drag each action to the correct element





Actions

Monitoring and responding to identified issues and taking actions to correct and prevent the recurrence of problems.

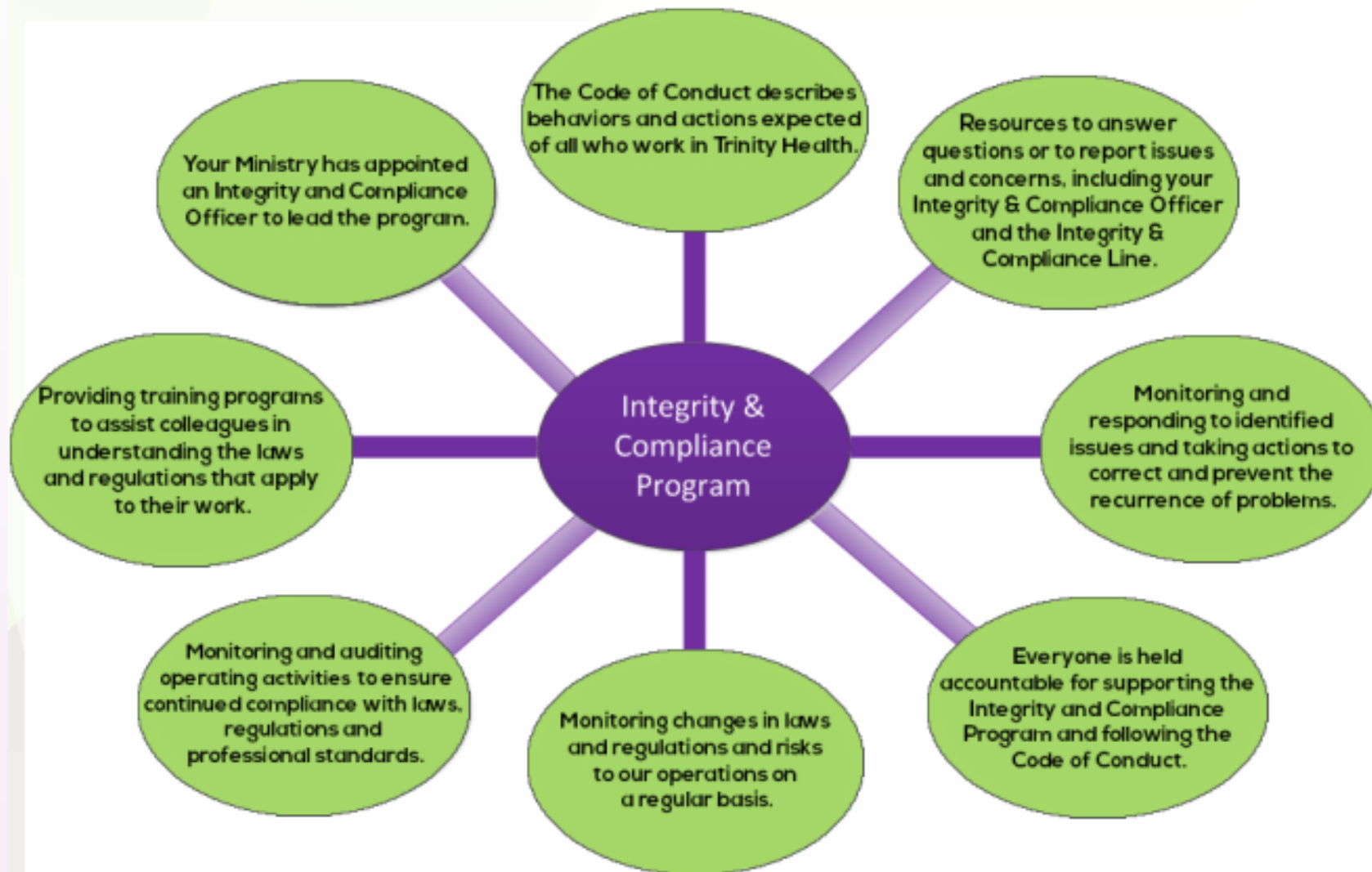
Drag each action to the correct element



Actions

Your Ministry has appointed an Integrity and Compliance Officer to lead the program.

Drag each action to the correct element



Actions

Good job!

**Click on
Next to
continue**



Code of Conduct

Describes actions and behaviors expected of:

- Colleagues
- Volunteers
- Medical Staff
- Independent Contractors
- Suppliers and Other Business Partners



Relationships with Those We Serve

Patients, residents, their family members,
and communities we serve = our #1 priority!

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Relationships with Those We Serve

You are expected to:

- Deliver people-centered, high quality health care services
- Speak up if you see a quality or safety issue
- Demonstrate the highest levels of ethical and professional conduct
- Create and maintain complete, timely, and accurate medical and other records
- Safeguard the privacy and confidentiality of all Protected Health Information (PHI)
- Follow all professional standards that apply to your position

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Relationships with Those We Serve

Programs in Trinity Health will help us achieve:

- Better health
- Better care
- Lower costs

Accountable Care Organizations (ACOs)
Bundled Payment for Care Improvement (BPCI)



Relationships with Those We Serve

Health care that is medically necessary and appropriate

People-centered care that is more effective and efficient

Relationships with Those We Serve

Relationships with Coworkers and Others

Relationships with Suppliers and Other Business Partners

Relationships with Regulators and Those Who Pay For Our Services

Relationships with Trinity Health and the Communities We Serve

What Should You Do?



Click each purple box to continue.



What Should You Do?



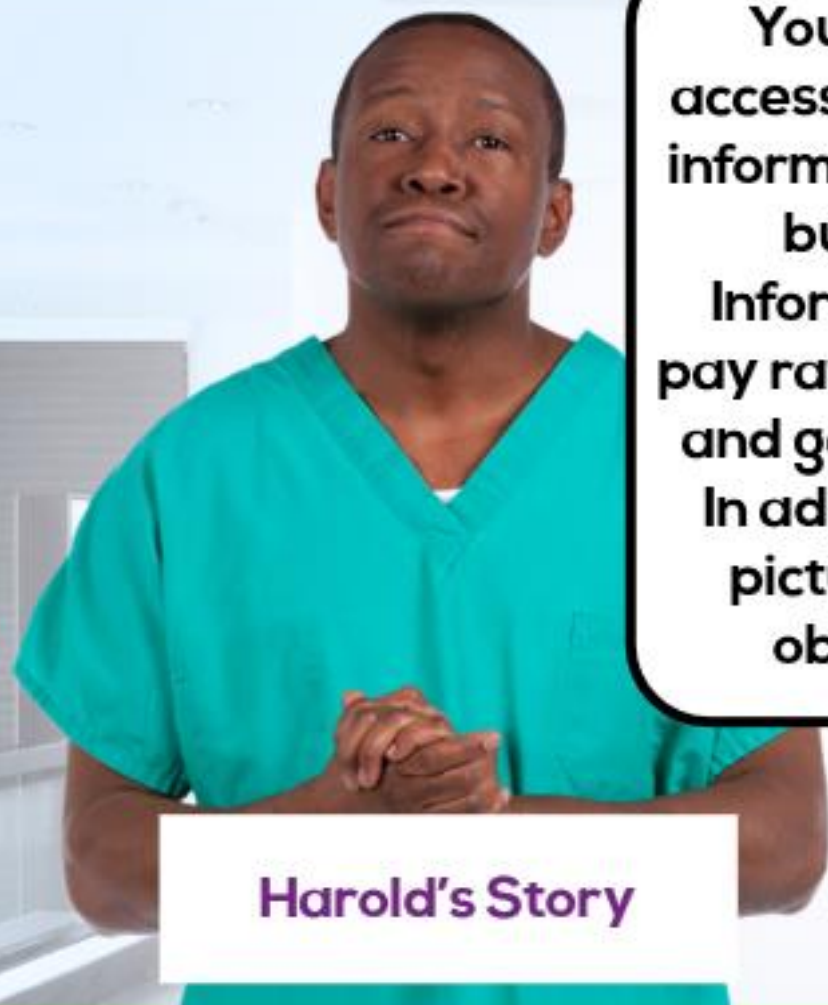
Harold's Story

I'm putting together a slide show with my team's birthdates and pictures that I'd like to share at our next department meeting. I found their birthdates in the patient billing system that I have access to for my job and I took the pictures myself. Do I need permission from anyone to share this information?



Click each purple box to continue.

What Should You Do?



Harold's Story

You should only use your work access to systems containing patient information when it's for a legitimate business or clinical purpose. Information such as birthdates or pay rates are considered confidential and generally should not be shared. In addition, whenever you share a picture of a colleague, you must obtain prior written consent.



Integrity and Compliance Officer

Click each purple box to continue.



Privacy and Security of Patient Information

Core Value of Reverence

Health Insurance Portability and Accountability Act (HIPAA) and state laws

We must protect and secure the privacy of all protected health information (PHI)

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Privacy and Security of Patient Information

PHI includes:

- Paper and electronic records
- Films and digital images
- Data files
- Verbal discussions

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Privacy and Security of Patient Information

- Access, review, and use PHI only if necessary to do your job
- Keep user IDs and passwords confidential
- Secure any devices, data files, and printed materials containing PHI
- Do not leave PHI unattended or available to others
- Do not discuss PHI in public areas
- Do not discuss or post PHI on social media sites
- Report the loss or theft of any PHI to your supervisor or Privacy Official

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Relationships with Co-workers and Others Who Serve with Us

Trust and Respect = Effective Teamwork

Relationships with Those We Serve

Relationships with Coworkers and Others

Relationships with Suppliers and Other Business Partners

Relationships with Regulators and Those Who Pay For Our Services

Relationships with Trinity Health and the Communities We Serve



Relationships with Co-workers and Others Who Serve with Us

You are expected to:

- Treat others with honesty, dignity, and respect
- Speak professionally and respectfully
- Commit to working with others in a team environment
- Anticipate and respond to requests for information or assistance in a timely manner
- Respect the diversity of others and do not discriminate

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Relationships with Co-workers and Others Who Serve with Us

Abstain from behaviors that are harassing, abusive, disorderly, offensive, intimidating or disruptive.

Report any inappropriate behaviors that you see.

Maintain a safe work environment free of drugs or alcohol.

Relationships with
Those We Serve

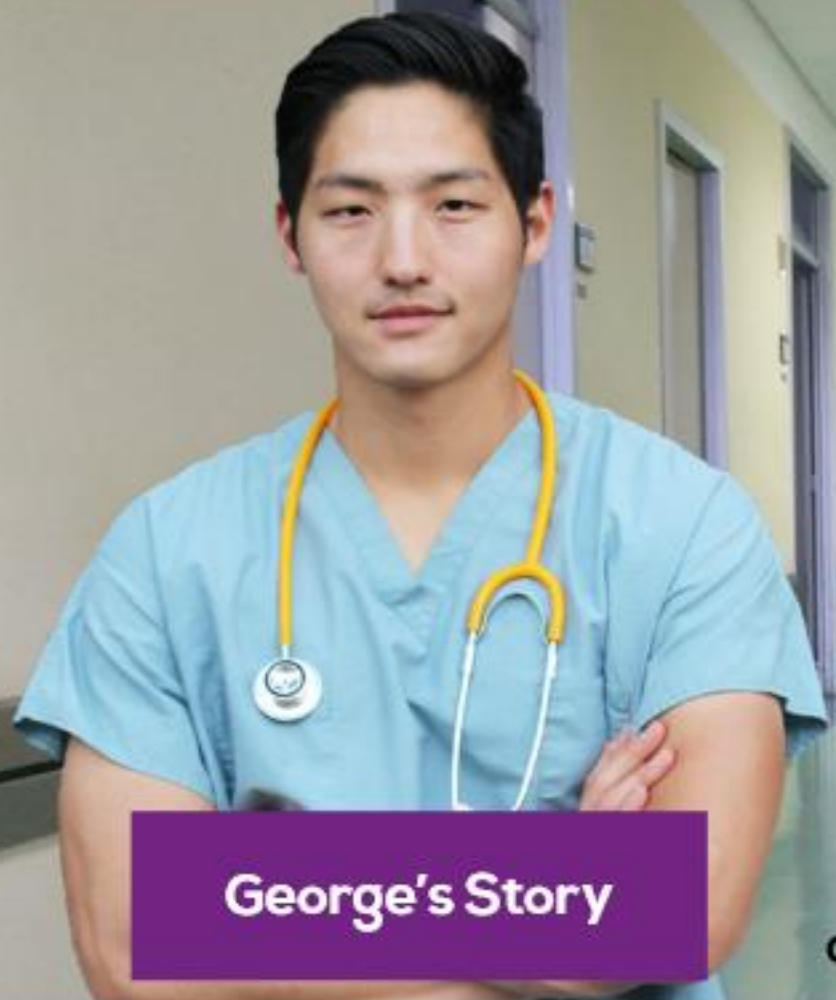
Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve

What Should You Do?

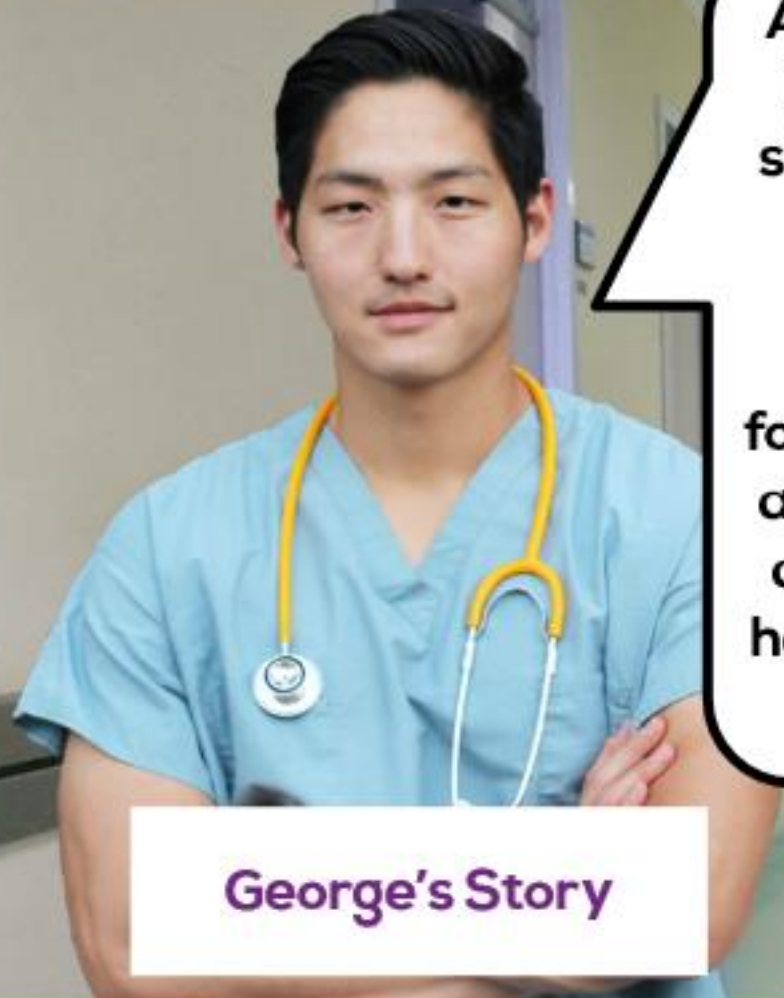


George's Story



Click each purple box to continue.

What Should You Do?



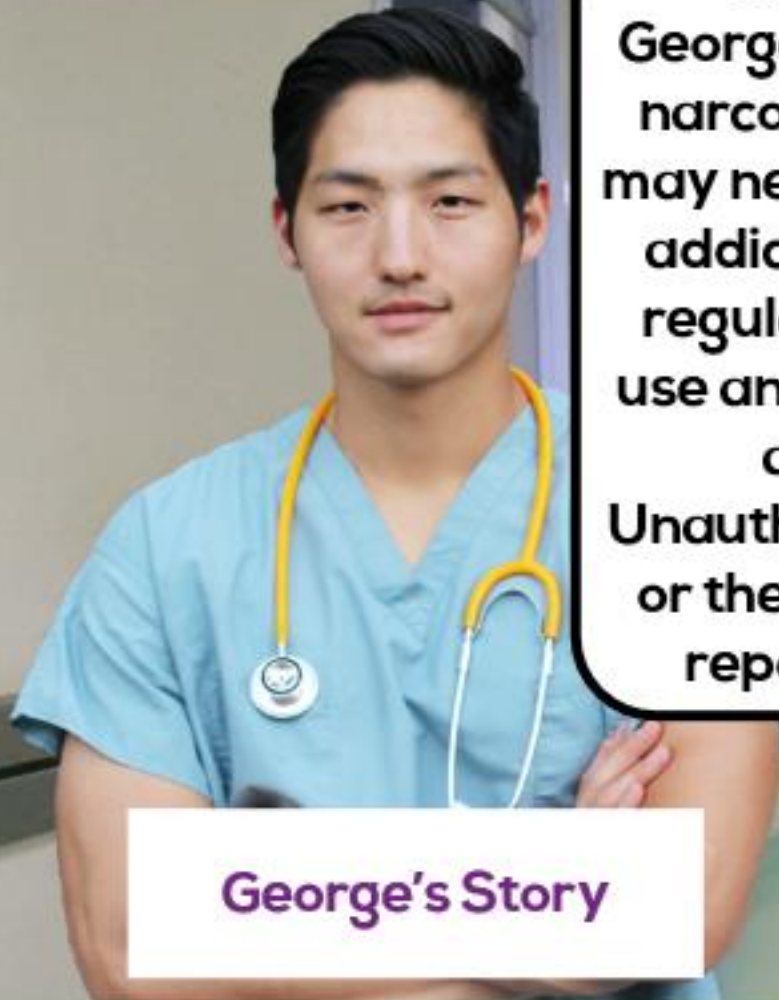
George's Story

A co-worker, Jenna, on my floor has recently been asking me to sign for wasting a narcotic when I didn't see her waste it. I am concerned because she has recently returned to work following a lengthy recovery from a back injury from a car accident, and in conversation has said she had taken a lot of strong narcotics for pain while recovering.



Click each purple box to continue.

What Should You Do?



George's Story

This could be a serious issue. If George's friend Jenna is taking strong narcotics without a prescription, she may need help and could be battling an addiction. There are many laws and regulations that apply to the access, use and disposal of prescription drugs and controlled substances. Unauthorized access, use, or diversion, or theft, is prohibited. George should report his concerns immediately.



**Integrity and
Compliance Officer**

Click each purple box to continue.



Relationships with Suppliers and Other Business Partners

Our Core Value of Stewardship.

No gift is free – the cost is reflected in the price of goods and services purchased by Trinity Health. Do not accept gifts, entertainment, meals, or other incentives:

- To influence purchasing or contracting decisions
- To encourage or reward patient referrals
- That could be perceived as a bribe, payoff, deal, or any other attempt to gain a competitive advantage

Do not accept cash or items redeemable for cash such as checks, gift cards, etc.

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Relationships with Suppliers and Other Business Partners

Colleagues should not accept meals and refreshments paid by suppliers or other business partners.

Do not accept gifts that involve entertainment or social activities (e.g. sporting event tickets, concert events, golf outings).

Use common sense!

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Conflicts of Interest

Outside activities or relationships that influence-- or could appear to influence--your judgment and decisions in Trinity Health

Potential Conflicts of Interest

Outside employment

Endorsements and testimonials

Financial interests

With conflicts of interest, appearances count

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve

What Should You Do?




Barbara's Story



Click each purple box to continue.

What Should You Do?



One of the suppliers that I work with bought a table at my hospital's annual fundraising gala. They have five extra seats, and they invited me and my team to take them. Am I allowed to accept the invitation?

Barbara's Story

Click each purple box to continue.



What Should You Do?

Suppliers and other business partners may occasionally donate to charitable fundraising events that benefit Trinity Health and affiliated organizations—for example, a foundation. These events may include social or entertainment activities such as a gala dinner or golf event where Trinity Health colleagues are invited to participate with a supplier or business partner.

A woman with short dark hair, wearing a black and white patterned blouse, smiling.

Barbara's Story

Click each purple box to continue.

A woman with long dark hair, wearing a grey blazer, smiling with her arms crossed.

**Integrity and
Compliance Officer**



Relationships with Regulators and Those Who Pay For Our Services

Federal and state health care programs (Medicare and Medicaid)

Commercial insurers

Other third parties

Laws and Regulations

- Numerous and complex
- Frequently changing
- Challenging

Trinity Health is committed to complying with all laws and regulations

Relationships with Those We Serve

Relationships with Coworkers and Others

Relationships with Suppliers and Other Business Partners

Relationships with Regulators and Those Who Pay For Our Services

Relationships with Trinity Health and the Communities We Serve



Relationships with Regulators and Those Who Pay For Our Services

Federal and state health care programs (Medicare and Medicaid)

Commercial insurers

Other third parties

Laws and Regulations

- Numerous and complex
- Frequently changing
- Challenging

Trinity Health is committed to complying with all laws and regulations

Relationships with Those We Serve

Relationships with Coworkers and Others

Relationships with Suppliers and Other Business Partners

Relationships with Regulators and Those Who Pay For Our Services

Relationships with Trinity Health and the Communities We Serve

Fraud, Waste, and Abuse

- Submitting false or fraudulent claims for services
- Submitting claims for services not provided
- Submitting claims for medically unnecessary services
- Concealing or avoiding an obligation to repay amounts owed to a health care program
- Offering or paying money, goods, or anything of value for patient referrals





Mistake

Inefficiencies

Bending
the Rules

Intentional
Deception



Error



Waste



Abuse



Fraud

Examples:

Incorrect
Coding

Medically
unnecessary
service

Improper Billing
practices (such
as, upcoding)

Billing for services
or supplies that
were not provided



Physicians and Other Referral Sources

Anti-Kickback Statute

The Stark Law (Physician Self-Referral Law)

Violations can result in significant legal and financial penalties

We do not pay for referrals

We do not accept payment for referrals

Contact your organization's legal department or your Integrity and Compliance Officer if you need more information about Trinity Health policies.

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



The False Claims Act

- Crime to knowingly submit a:
- False record or false claim
 - To a federal health care program
- State false claims laws
- Penalties for violations can be significant



The False Claims Act

Keys to Preventing False Claims:

- Maintain complete and accurate medical records
- Submit complete and accurate claims for services provided
- File complete and accurate reports with payers and government agencies
- Follow all requirements of Medicare, Medicaid, and other health care programs
- Promptly investigate potential payment errors, take corrective actions, and timely return overpayments

What Should You Do?



Arthur's Story



Click each purple box to continue.

What Should You Do?



Arthur's Story



Click each purple box to continue.

What Should You Do?



Arthur's Story



Click each purple box to continue.



Relationships with Trinity Health and the Communities We Serve

Trinity Health colleagues are expected to:

- Properly use and protect Trinity Health resources, materials, equipment, and assets

- Use good judgment and follow organization policies for business travel and reporting

- Prepare and maintain accurate and complete financial and other records

- Properly use and protect the confidentiality of all business information

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Relationships with Trinity Health and the Communities We Serve

Trinity Health colleagues are expected to:

- Follow policies for access, use, and security of electronic media (e.g. computers, email, Internet)
- Maintain appropriate licenses, certifications, and other credentials
- Complete assigned education and training programs

Relationships with Those We Serve

Relationships with Coworkers and Others

Relationships with Suppliers and Other Business Partners

Relationships with Regulators and Those Who Pay For Our Services

Relationships with Trinity Health and the Communities We Serve



Use of Social Media

Exercise good judgment and personal responsibility when using social media

Facebook™

Twitter™

LinkedIn™ or other sites

Do not post Trinity Health confidential information

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve



Use of Social Media

Do not reference or associate Trinity Health to solicit, endorse, or promote:

- Outside business ventures
- Political campaigns or candidates
- Religious causes

Relationships with
Those We Serve

Relationships with
Coworkers and
Others

Relationships with
Suppliers and Other
Business Partners

Relationships with
Regulators and
Those Who Pay For
Our Services

Relationships with
Trinity Health and the
Communities We
Serve

What Should You Do?



Mikhail's Story



Click each purple box to continue.

What Should You Do?



Mikhail's Story

I help my boss prepare her expense reports. She often submits receipts for meals and entertainment expenses without specifying who was in attendance or the business purpose. My boss is extremely busy and I don't like to bother her or look like I don't trust her. What should I do?



Click each purple box to continue.

What Should You Do?

First, make sure you clearly understand the required documentation policies for expense reimbursements. Share these requirements with your boss and explain you want to assist her. Ultimately, she is responsible for the expense reimbursement claims submitted on her behalf. If this approach is not successful, contact a higher level manager or your Integrity & Compliance Officer.

A smiling Black man in a dark striped shirt.

Mikhail's Story

Click each purple box to continue.

A smiling woman with dark hair in a grey blazer.

**Integrity and
Compliance Officer**

What is Expected of you?

You are expected to:

- Review and follow the Code of Conduct
- Participate in periodic compliance training
- Ask questions when uncertain about what to do
- Speak up about issues or concerns, including potential violations of laws or regulations

**Expectations of
Leaders**



governance
adequate systems a
laws, regulations a
Compliance pract
and standards, s
safety and securi

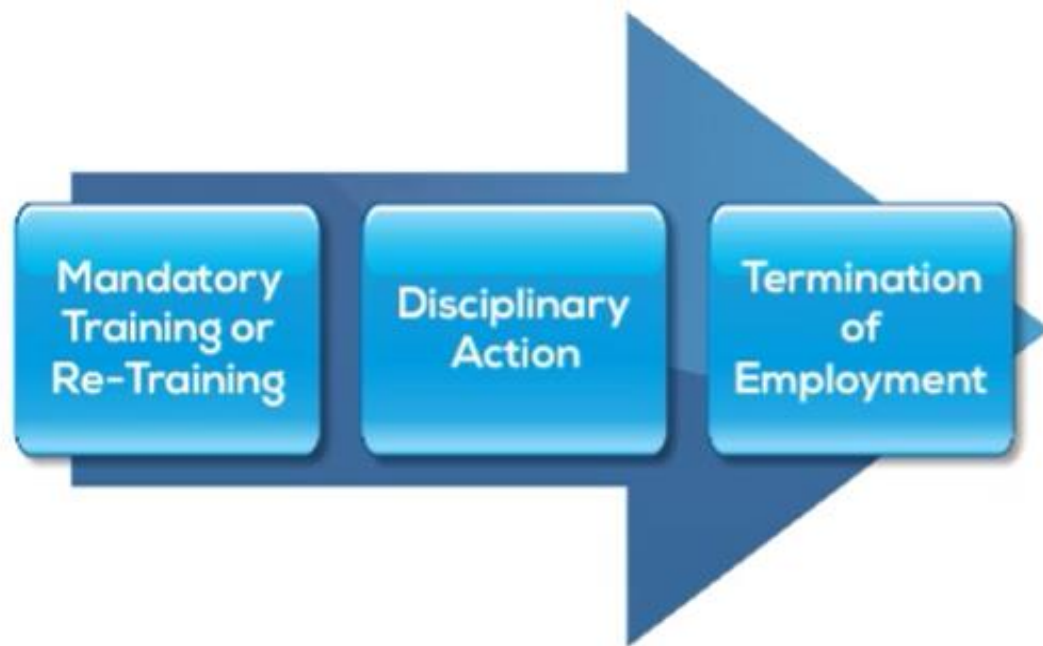
Responsibilities of Leaders

Leaders in Trinity Health have a responsibility to:

- Support our Mission and Core Values
- Serve as a role model for high ethical standards
- Clearly communicate your expectations for high standards to others
- Promote a culture of trust, respect, and open communication
- Hold those you lead accountable to following the Code of Conduct
- Encourage others to ask questions and raise concerns
- Respond timely and appropriately
- Ensure Trinity Health's non-retaliation policies are followed



Consequences of Violations



All colleagues are expected to:

- Support the Integrity and Compliance Program
- Follow the Code of Conduct

Accountability for behaviors and actions inconsistent with the Code of Conduct

Violations of the Code will result in disciplinary actions



Questions



Issues and concerns



Compliance matters



Obligation to Speak-Up!



Where to Find Help

Immediate Supervisor

A Higher-Level Manager

Human Resources

[Integrity and Compliance Officer](#)



Where to Find Help

Immediate Supervisor

Mission Department

Logical Ethics Committee

Medical Staff Office

Privacy and Security Officials

Risk Management and Safety Department

Patient and Colleague Safety Event

Reporting System

[Integrity and Compliance Officer](#)

[Privacy Officials](#)



Integrity & Compliance Line

866-477-4661

www.mycompliancereport.com



Thank You!

**Integrity and Compliance Program
New Hire Training**

You should now be able to describe:

- Trinity Health's Integrity and Compliance Program
- Key areas in Trinity Health's Code of Conduct
- Your responsibilities to support the Integrity and Compliance Program
- Resources available to answer questions or to report issues and concerns

You may now exit this course.

