

# Central Control Annual Compliance Training

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# Compliance and Ethics

*Not just because we have to... But because We Choose To*

## CCI Mission Statement

We will operate and manage health care facilities so that value is added through our employees in the process. We will constantly strive to improve our operations through performance improvement, managing productivity, costs, and the provision of quality leadership, and planning. **We will serve with absolute integrity and honor.**



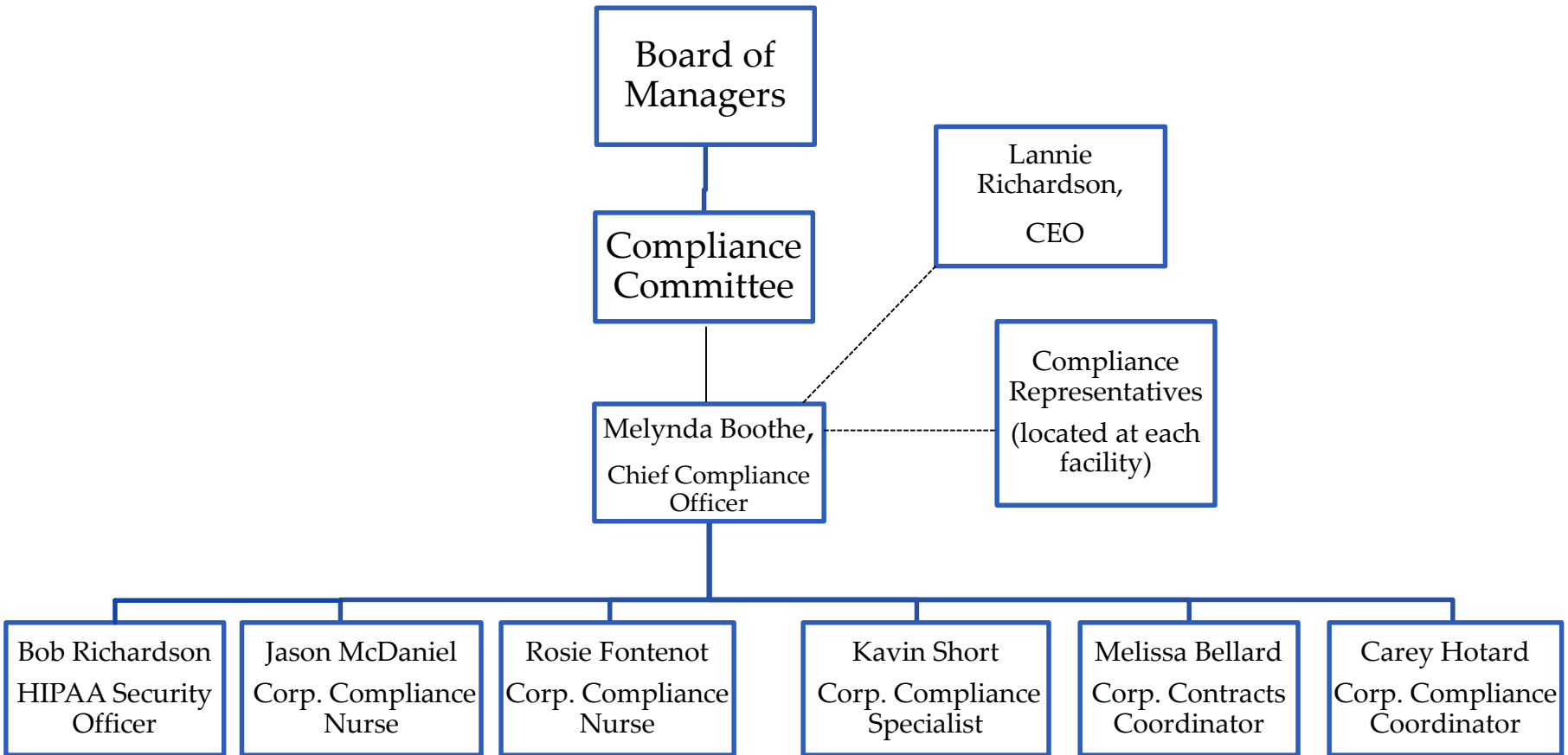
## Values

We will seek to glorify God in everything we do. We will be the recognized provider of choice, and employer of choice, in the markets we serve.





# Organization of Compliance Department





# Compliance Program Goals

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## Excellence in Care

Provide quality, compassionate, respectful and clinically appropriate care to patients

## Professional Excellence

Maintain ethical standards of healthcare and business practice

## Regulatory Excellence

Complying with Federal and State regulations and guidelines



# Code of Conduct and Ethics

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The purpose of the Code of Conduct and Ethics is to help ensure that we:

- Turn our values into actions
- Follow all the laws and rules that apply to us

The Code of Conduct and Ethics:

- Is distributed to all employees and contractors
- Sets out basic principles that we all must follow
- Communicates specific policies to staff



# What does this mean for me?

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All staff is responsible for:

- Abiding by all rules, regulations, laws, and company policies.
- Behaving in a manner consistent the Company Conduct and Ethics.
- Acquiring knowledge about how to recognize compliance issues.
- Reporting actual or suspected violations of the Code of Conduct and Ethics and/or any laws, regulations, and standards that they may have observed.
- Forwarding to the Chief Compliance Officer or Compliance Representative any concerns along with any evidence of misconduct that may assist in an internal investigation.



# What does this mean for me?

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## Fair Treatment of Staff:

- Non-retaliation-The company does not allow retaliation against anyone who, in good faith, reports a possible violation even if not actual problem.
- Reporting- Employees and contractors are required to report knowledge of misconduct.
- Monitoring-The company will use reviews and audits to make sure that all staff is following the Code of Conduct and Ethics.
- Enforcement- If a violation is found , the problem will be corrected and disciplinary action taken toward the people involved in an appropriate and fair way



# What does this mean for me?

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## Training

- Initial Compliance and Ethics Training upon hire and annually thereafter.
- Specialized training tailored to employees respective responsibilities.
- Ongoing education may be through written materials, newsletters, website, staff meetings.
- Employees are encouraged to and are required to request additional training if they feel that they are in need of it.





# Open Lines of Communication

## Reporting Mechanisms:

- Supervisor
- Management Team or HR
- Compliance Line Number 1-888-283-7965
- Website, compliance email
- Call Compliance Department at (337) 989-2770

COMPASSION  
C C  
CARING I INTEGRITY

We will be the recognized provider of choice,  
and employer of choice, in the markets we serve.

Home  
Management  
Privacy Notice

CEO Wants To Know  
Compliance Wants To Know  
Satisfaction Forms

Facilities Frequently Asked Questions News About Us Co

### Compliance Wants To Know

We're ready to assist you.

Contact us >>

\* Required

First Name \*

Last Name \*



# Investigations

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## Internal

- The Company will promptly and thoroughly investigate reports of illegal activity or violations of the Code of Conduct and Ethics.
- All staff must cooperate with these investigations. They must not take any actions to prevent, hinder, or delay the investigation.
- Staff who violate the Code or commit illegal acts are subject to discipline up to and including dismissal.
- Staff who report their own illegal acts or improper conduct, however, will have such self-reporting taken into account in determining the appropriate disciplinary action.



# Investigations

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## Government Interviews or Investigations

- All staff will cooperate fully and promptly with government investigations.
- Employees who participate in government interviews must give answers that are truthful, complete, and clear.
- If a staff member receives a subpoena, search warrant, or other similar document, the employee should immediately contact the Chief Compliance Officer or Compliance Representative.
- If a government investigator, agent, or auditor comes to the Company, the employee should immediately contact the Chief Compliance Officer or Compliance Representative.
- The Chief Compliance Officer or Compliance Representative should handle the release and copying of documents.



# Standards of Behavior

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- *Provide quality care and protect the rights of all residents/patients.*
- *Follow all laws and rules and be ethical, fair, and honest.*
- *Avoid conflicts of interest and make decisions that are in the best interest of Company and residents / patients.*
- *Promote a safe environment and appropriate workplace practices*



# Provide Quality of Care and Protect Resident/Patient Rights

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We treat all residents/patients in a manner that protects their rights and preserves their dignity, autonomy, and self-esteem.

Residents/patients are involved in all aspects of their care.

Each resident/patient receives not only quality care and caring treatment, but also appropriate confidentiality, privacy, and security.



# Provide Quality of Care and Protect Resident/Patient Rights

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## **Informed Consent**

All residents/patients are entitled to the information they need to make decisions about their treatment and to give their informed consent to treatment.

## **Authorization for Treatment**

All adult residents/patients must have the opportunity to make decisions about their treatment. A competent adult has a right to make decisions about his or her care.

## **Equal Access to Care**

The Company will provide all residents/patients with equal access to care and do not discriminate because of race, creed, sex, national origin, sexual orientation, disability, or age. Financial considerations, however, may be taken into account.



# Provide Quality of Care and Protect Resident/Patient Rights

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## Quality of Care/Rights

Each patient has the right:

- **To be told about his or her rights;**
- **To be involved in his or her plan of care;**
- **To formulate advance directives and to have those directives followed;**
- **To have privacy and to receive care in a safe setting;**
- **To be free from verbal or physical abuse or harassment;**
- **To expect confidentiality of his or her medical records and health information;**
- **To look at and make copies of his or her medical records.**



# Provide Quality of Care and Protect Resident/Patient Rights

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## **Freedom of Choice**

Unless a resident/patient's care is covered under Medicare Part A or by a payer who requires the use of certain vendor, he/she should be free to choose a provider for his or her care.

## **Confidentiality**

Residents/patients have a right of complete confidentiality in health care. Neither the Company nor any affiliate allows unauthorized seeking or sharing of information related to a patient's medical care.

## **Billing Information**

Residents/patients are told about the Company's and specific affiliate's billing and payment policies. Their questions about billing and payment must be answered fully, promptly, and courteously.





# Provide Quality of Care and Protect Resident/Patient Rights

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## Summary

To summarize, this standard speaks to the core of our business, “Quality Care.” Each of the individuals we serve has the right to receive quality healthcare in the least restrictive environment and with emphasis on Dignity and Rights.

Ask yourself:

- Do you ensure that you always get **Informed Consent** for residents and patients before you perform a treatment?
- Do you make sure there is an **Authorization for Treatment** (prior to treating)?
- Do you make sure that all those you serve have **Equal Access to Care** (regardless of race, religion, disability, and ethnic background)?



# Provide Quality of Care and Protect Resident/Patient Rights

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## Summary (continued)

- Do you do everything in you power to provide excellent **Quality of Care** while respecting Rights?
- Do you make sure that those you serve have **Freedom of Choice** to choose their healthcare providers?

I hope each of you can answer yes to each of these questions every day.



# Following Federal, State and Local Laws

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## **HIPAA Requirements**

The Company recognizes the requirements of the Health Insurance Portability and Accountability Act of 1996, (“HIPAA”)

All staff will protect patient information from being seen, heard, or read by anyone not authorized to do so.

## **“Fraud and Abuse” laws and regulations**

All employees agents are expected to guard against fraud and abuse.

Any and all Fraud and Abuse violations and problems should be reported to the Chief Compliance Officer or Compliance Representative.

Employees and contractors are encouraged to check with the Chief Compliance Officer or Compliance Representative to resolve any doubts that may exist regarding business arrangements with physicians, nursing homes, equipment companies, pharmaceutical companies, or other providers for whose services the government may be billed.



# Following Federal, State and Local Laws

## **Stark and Anti-Kick Back Laws**

***To ensure that no one connected with the Company or any affiliate takes or gives a kickback, the following policies are in place:***

- No money, gift, discount, rebate, loan, service, or gratuity of any kind should be offered, given, or taken in exchange for, or to encourage, the referral of residents/patients/consumers.
- All contracts and other arrangements with referral sources must follow all laws that apply.
- Any physician who receives a payment of any kind from the Company must keep records of the time, date, and type of services provided and must submit those records before receiving payment.
- All payments to physicians or other sources of referrals must be at fair market value and may not take into account the volume or value of referrals to a provider.



# Following Federal, State and Local Laws

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## **Political Activities**

No Company, affiliate funds, or property shall be used for any political contribution or purpose unless first approved by the Company's CEO.

Employees may make direct contributions of their own money to political candidates and activities, but these contributions will not be reimbursed.

## **Licensure and Certification Renewals**

Employees and contractors in positions that require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines.

## **Billing Practices**

The Company and its affiliates bill only when services have been provided and properly documented.



# Following Federal, State and Local Laws

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## **Eligibility Requirements**

No claims for payment for services may be submitted unless the resident/patient/consumer has been determined to be eligible for care provided and the services were ordered by the appropriate professionals in accordance with the plan of care.

## **Compliance with Records Retention & Entry Requirements**

All records and materials must be made and kept as required by law.

All records must be prepared accurately and honestly.

Entries to a patient's medical record should be made at the time that the service is given and must be dated when made.

If an entry cannot be made at the time of the service, it should be noted as a late entry. The use of liquid paper is prohibited in patient charts



# Following Federal, State and Local Laws

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## **Summary**

When thinking about how you can stay compliant with all of the laws and regulations, you might want to start by asking yourself?

- Have I accepted money, gifts, discounts, rebates, loans, service, or gratuity of any kind in exchange for, or to encourage, the referral of residents or patients?
- Do all of the contracts I arrange follow all laws that apply?
- Do I have a conflict of interest such as having a personal financial interest that influences or appears to influence my ability to make objective decisions related to my job and/or make me not able to give the time or attention needed to my job?
- Do I use Company resources for purposes not related to Company business?
- Do I follow all of the regulations as outline by third party payers such as Medicare, Medicaid, and Private Insurance?



# Following Federal, State and Local Laws

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## **Summary (continued)**

While the list of questions can go on for pages, at the end of the day, the most important question is:

**“When I look in the mirror, can I honestly say that my actions are driven by honesty and integrity?”**

That is the spirit of this standard of behavior.





# Conflict of Interest

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The Company's employees and agents are expected to be loyal to and must avoid doing things that conflict with the interests of the Company, its affiliates or with the interests of our residents/patients.

***A conflict of interest may exist if a staff member:***

- Has a personal financial interest that influences or appears to influence his or her ability to make objective decisions related to their job; and/or
- Is not able to give the time or attention needed to do his or her job at the Company and/or
- Uses Company resources for purposes not related to Company business.



# Conflict of Interest

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## **Receiving Business Courtesies (GIFTS)**

**A staff member may not ask for or take, directly or indirectly, for themselves or any member of their household, any gift, or other thing of monetary value from anyone, including residents/ patients or anyone who has or is seeking a business relationship with the Company or any affiliate.**

## **Extending Business Courtesies (GIFTS)**

The Company may offer reasonable and appropriate meals and entertainment when sponsoring an event for a business purpose.

## **Disclosure of Physician Ownership**

Physicians who have an investment interest in the Company or any affiliate and who refer residents/patients for services provided by the affiliate will disclose this investment interest to residents/patients through the use of the Disclosure of Financial Interest Form.



# Conflict of Interest

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## Summary

While there are not hard and fast rules, there are some simple questions you can ask yourself to help you answer the question:

### **IS THIS A CONFLICT OF INTEREST?**

- Do I have an outside commitment that prevents me from dedicating my full attention to my job with CCI?
- Do I have or does my family member have a financial interest that conflicts with the interest of the Company in any manner?
- Do I participate in managerial or consultation services to any outside entity that does business with the Company without the Company's prior knowledge and consent?
- Do I receive compensation, gifts, favors, entertainment or other similar benefits of more than a nominal value from any outside entity which does or seeks to do business with the Company?



# Conflict of Interest

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## Summary (continued)

### IS THIS A CONFLICT OF INTEREST?

- Have I disclosed or used confidential, special or inside information of or about the Company for personal profit or advantage?
- Do I participate in decisions about the purchase of goods or services from any organization in which I or my family member have a financial interest?

The best advice to avoiding conflicts of interest is to remember when in doubt....ask. The compliance department is always happy to discuss in private with any employee their concerns or questions regarding possible conflicts of interest.



# Promote Safe Environment and Appropriate Work Place Practices

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## **Compliance with Environmental Safety Laws**

The Company and its affiliates must follow all the laws and rules for disposing of all waste, especially hazardous and medical waste.

## **Compliance with Health and Safety Requirements**

Employees should know and understand the laws, rules, and policies for their job and work area. If there are questions, a supervisor should be asked.

In the event of any on-the-job injury, such an injury must be promptly reported to the appropriate supervisor or manager.

The facility supervisor or manager should also be notified of any dangers or unsafe conditions so the problem can be corrected.



# Promote Safe Environment and Appropriate Work Place Practices

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## **Controlled Substances**

All healthcare professionals must comply with all federal and state laws regulating controlled substances.

Any Staff member who knows or suspects the unlawful or unauthorized possession, or use of illicit drugs must immediately notify his or her supervisor and the Chief Compliance Officer.

## **Harassment and Workplace Violence**

Neither the Company nor any affiliate will tolerate harassment by anyone based on race, religion, sex, or any other individual characteristic.

The Company prohibits staff from possessing weapons or other dangerous items or materials on Company or affiliate premises.

Persons who observe or experience any form of harassment or violence should report the incident to their supervisor.



# Promote Safe Environment and Appropriate Work Place Practices

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## **Electronic Media**

All communications systems, email, or voice mail are the property of the Company and are to be primarily used for business purposes.

Highly limited reasonable personal use of the Company's communications systems is permitted; however, these communications may not be private.

The Company reserves the right to periodically access, monitor, and disclose the contents of e-mail and voice mail messages.

No employee or agent may access to the Internet at work to post, store, transmit, download, or distribute any threatening, knowingly reckless, maliciously false or obscene materials.



# Promote Safe Environment and Appropriate Work Place Practices

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## **Human Resources Policies**

The Company and each affiliate follow all federal, state, and local labor laws and rules.

Employees are welcome to express any concern about their workplace to the Human Resources department. To help make sure that the Company complies with the law, certain Human Resources policies have been established that everyone must follow.

## **Marketing Policies**

The Company and each affiliate will act ethically in all its marketing activities. Marketing materials will reflect our mission and values. They will accurately describe the various services the Company's affiliates provide and the level of our licensure and accreditation, as applicable.

In no case will the Company or any of its employees offer or accept anything of value in exchange for or with the intent to induce patient referrals.





# Promote Safe Environment and Appropriate Work Place Practices

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## **Summary**

Always remember, we all are responsible for promoting and behaving in a safe and appropriate manner. If you have any concerns that you need help with at your facility, contact your supervisor, CCI Human Resources, or the Compliance Department for assistance.



# Enforcement

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## **Enforcement of the Program**

An effective compliance program requires enforcement.

Willfully violating the Program will result in disciplinary action, which will be appropriate for the severity of the activity.

Fraudulent activity will not be tolerated and will result in immediate termination.

Sanctions could range from oral warnings to termination.



# Acknowledgement of Training

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This concludes our Annual Compliance Training, and we thank you for your participation.

In order to receive credit for attending the required Annual Compliance Training, you must go to the CCI website, log into the Compliance 360 software, and complete the Acknowledgement. If you are unsure of how to do this, please see your Administrator for instructions.