

Ministry Health Care

Corporate Responsibility Program
Medical Staff Education



MINISTRY HEALTH CARE

today. tomorrow. together.

Important Notice

This presentation contains information about Ministry Health Care's Corporate Responsibility Program. Associates, including Medical Staff, at the following locations should remember to follow their site-specific policies and procedures related to Corporate Responsibility and HIPAA when they apply.

- The Diagnostic and Treatment Center
- Flambeau Hospital
- St. Elizabeth's Medical Center, Wabasha
- Agape Community Center (HIPAA Privacy does not apply)
- Door County Medical Center

Setting the Standard

Ministry Health Care (“Ministry”) and Ascension Health are committed to providing the highest quality health care services in compliance with all laws and regulations. Our compliance program is called the Corporate Responsibility Program (“Program”). Our Corporate Responsibility Program also includes HIPAA Privacy.

Ministry’s Corporate Responsibility Officer is responsible for the Program and works with Corporate Responsibility department staff, leaders, and local sites to implement and monitor Program activities.



Setting the Standard

Compliance with laws is consistent with our Mission and Values as a Catholic healthcare system. Our reputation for quality, integrity, honesty, and respect in all business dealings is essential to our continued success. We owe this to our patients and clients who count on us to “do the right thing.”



It is important that we conduct ourselves in an ethical, legal and above-board manner. Each of us has a stake in Ministry’s success.

As members of the medical staff, you are responsible for not only adhering to the By-laws, Rules and Regulations, and our Standards of Conduct, but also all administrative policies and procedures.

Setting the Standard

Our future depends on a conscious dedication to the values, ethical principles and standards outlined in this presentation and the Ministry Health Care Corporate Responsibility Program booklet. This booklet is also our Standards of Conduct. We are committed to setting the standard for our industry.

The Ministry Health Care Corporate Responsibility Program booklet is the Foundation of our Program.



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Setting the Standard

Our Program is designed to show you how to avoid putting yourself or the organization at risk. We ask that you read the Ministry Health Care Corporate Responsibility Program booklet and this presentation. The booklet can be found on your facility's medical staff web page.



This presentation and the booklet provide standards for conduct; as well some Program policy information. We offer this information because the complex health care environment can sometimes make it difficult to determine right from wrong.

Setting the Standard

We should avoid actions that undermine our values or that violate legal requirements. We should always try to do the right thing. If you are uncertain what is right, this presentation will suggest ways to find an answer.

You should know the rules and regulations that apply to your job. The following resources are available to assist you.

- The Ministry Health Care Corporate Responsibility booklet
- Your facility's medical staff office and leaders should have information on the rules and regulations
- Corporate Responsibility policies/procedures such as those on Fraud and Abuse Laws and Protections
- Ministry's Corporate Responsibility department

Setting the Standard



It is often obvious when something is right or wrong. When dealing with government regulations, common sense isn't always enough. It is important Ministry associates, including medical staff follow the principles outlined in our Corporate Responsibility booklet. With your

help, we can demonstrate that having strong values not only means doing the right thing, it also means good business.

Getting Answers to Business Ethics & Corporate Responsibility Questions

Open discussion of ethical and legal issues is vital to the effectiveness of our Corporate Responsibility Program. Should you have questions about ethical, legal, or HIPAA Privacy issues, use the process outlined in the Corporate Responsibility booklet and on the following slides.



Getting Answers

- **Discuss the issue with your supervisor/manager/team leader.**
They know you and the issues in your workplace better than anyone. Give them a chance to help solve the problem. They have access to a variety of resources.
- **Speak to a higher level manager.**
If you and your supervisor cannot find an answer, you do not feel your concern is receiving proper attention, or you are not comfortable discussing a situation with your supervisor/manager/team leader, request a meeting with a higher level manager.

Getting Answers

- **Speak to someone in the following departments:**
 - Medical Staff Affairs (employed physicians/medical staff physicians)
 - Human Resources → employment related concerns
 - Mission/Ethics → clinical ethical issues
 - Risk/Quality Management → patient care issues
 - Safety and Security → workplace safety issues
 - System or Local HIPAA Privacy/Security Officers → use and protection of patient health information

Getting Answers

- **Speak to your Regional Director of Corporate Responsibility and Privacy or other Corporate Responsibility department staff.**

Corporate Responsibility (Compliance) Questions or Issues

- ❖ **Bob Reed** - 715.356.5006
System Director Corporate Responsibility Officer
- ❖ **Kelly Fritz** – 920.628.9213

Billing and Coding Compliance Questions or Issues

- ❖ **Julie Haglund** – 715.723.1506
- ❖ **Rachael Cochart** – 920.866.2767
- ❖ **Sandi Diederich** – 715.343.3124

Patient Privacy and HIPAA Questions or Issues

- ❖ **Nancy Davis** – 920.746.1613
System Director of Privacy
- ❖ **Mandy Coyle** – 715.669.7280
- ❖ **Sandi Diederich** – 715.343.3124

Getting Answers

- **Bring the matter to the attention of Ministry's Corporate Responsibility Officer**

Matters that cannot be resolved at the local level can be brought to the system's Corporate Responsibility Officer.

- **You may also report concerns to the Values Line**

Ascension Health Values Line – 1.800.707.2198

www.ascensionhealthvaluesline.org (report concerns online)

All concerns reported are handled by Ascension's Values Line representatives who forward them to Ministry's Corporate Responsibility department for review, assignment, investigation and resolution.

Corporate Responsibility Policies

Below are some important Corporate Responsibility Program documents and policies you should know about. The Standards of Conduct are found on your Ministry facility Medical Staff webpages. If you do not have access to The Source, you can request copies of the below policies from your Ministry facility Medical Staff Office or the Corporate Responsibility department.

Ministry Health Care Corporate Responsibility Program

- Ministry Health Care Corporate Responsibility Program Booklet (Standards of Conduct)
- Corporate Responsibility Program (Policy CI-46)
- Fraud and Abuse Laws and Protections (Policy CI-032)
- Non-Retaliation (Policy CI-10)

You should review these documents so you are familiar with the expectations and requirements they address.

Ethical Business Responsibilities

Honesty is a trait highly valued in all Ministry associates. There is an expectation that you will be honest in all your dealings with our patients, vendors, third party payers, and other customers. All associates and medical staff are responsible to be familiar with and follow our Corporate Responsibility Program booklet, as well as system and facility policies and procedures.

Leaders are expected to take responsibility for the actions of their associates. They should make sure associates understand and follow the standards discussed in this presentation. Leaders should listen to their associates' questions and act on reported concerns. All leaders are to set an example of high ethical standards in job performance.

Reporting & Investigating Violations

If you know of a possible ethical or legal violation, **report it**. Ministry investigates reports promptly and fully. Associates and Medical Staff are expected to cooperate fully with any internal System investigations.



Ethics and Discipline

Violations of the law or Ministry/facility policies and procedures may result in corrective action, up to and including dismissal. If you do not report a violation you are aware of, you may be subject to corrective action.

Ministry does not tolerate retaliation against those who report concerns in good faith. Retaliation is subject to corrective action in accordance with our policies and procedures. Please be sure to review Ministry's Non-Retaliation policy (CI-10).

Compliance with legal requirements and Ministry/facility policies and procedures is a condition of Medical Staff membership. This presentation does not constitute an employment contract or any contractual rights.

What is Expected of Me?

When acting in your Medical Staff role at Ministry Health Care facilities, you are expected to:

- Review and follow the Ministry Standards of Conduct, paying particular attention to those that apply to your Medical Staff role.
- Act in the best interest of Ministry Health Care, protect the confidentiality of information, and represent Ministry Health Care honestly and accurately.
- Operate within Ministry Health Care's policies, procedures, and ethical expectations to **PREVENT** noncompliance.
- If you **DETECT** potential noncompliance, **REPORT** it so Corporate Responsibility can work with leaders and associates to **CORRECT** the noncompliance. This protects patients, including federal health care program beneficiaries and our organization.
- Ask questions when you are uncertain what to do.

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