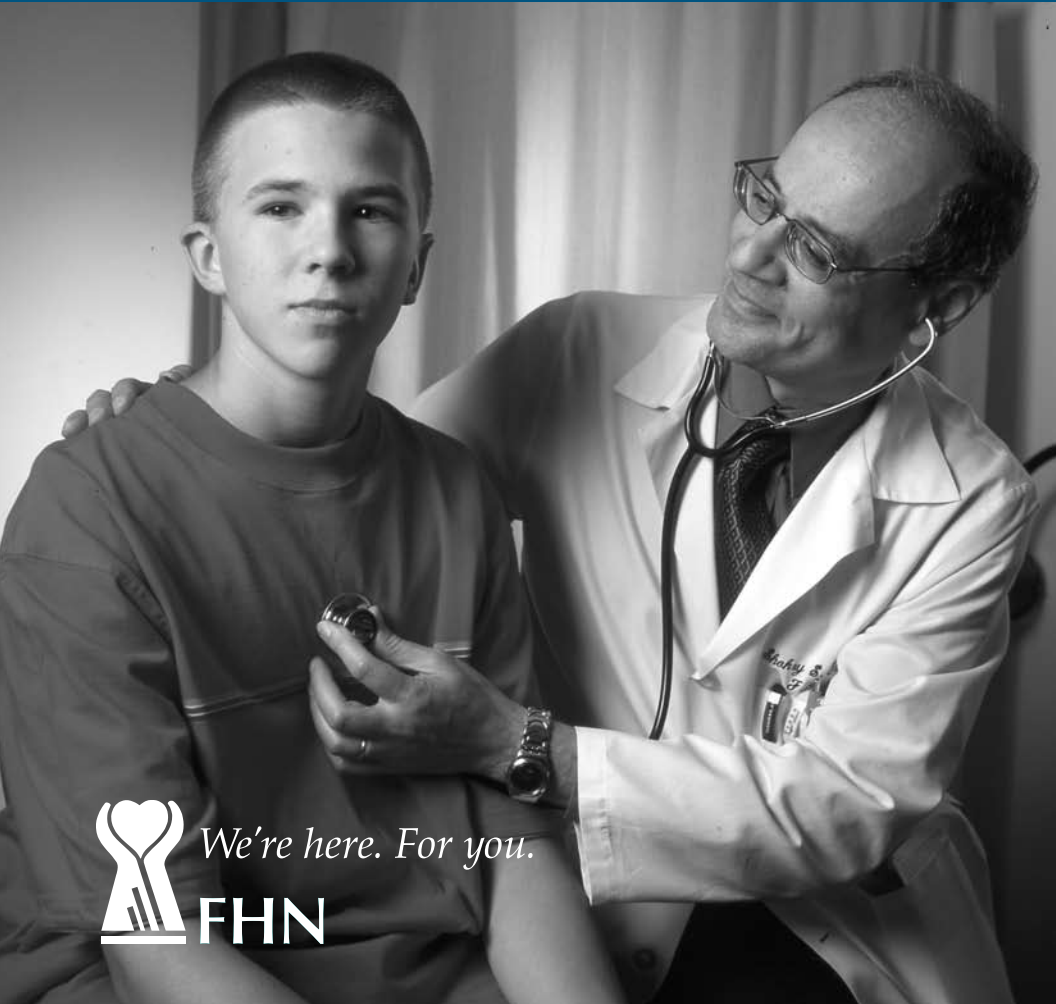


COMPLIANCE MATTERS

FHN, together with those we serve, improves health and provides superior quality healthcare services. Respect, dignity and compassion guide our interactions, while leadership and wise stewardship of resources direct the process.



We're here. For you.

FHN

INTRODUCTION

It is FHN's goal to provide the highest quality healthcare and to conduct our business ethically at all levels of the organization. To meet this challenge, we must all recognize that **COMPLIANCE MATTERS** and that each and every one of us plays a role.



WHAT IS COMPLIANCE?

To comply means to obey or conform. In healthcare, there are many federal and state laws and regulations that all providers must follow. FHN has developed its Compliance Program to make sure that we conduct our business legally and ethically. Some of the laws and regulations deal with patient care issues like safety, patient rights and quality. Others focus on non-clinical topics such as ethical business practices, professional referrals and conflicts of interest. Medicare, Medicaid and other insurance companies have rules for how we submit bills and receive reimbursement for services we provide. The FHN Compliance Officer monitors and audits how our Compliance Program is working, along with the help of an interdisciplinary team.

FHN's Compliance Program guides us to maintain our commitment to legal and ethical conduct by all our employees. It has two broad goals:

- To encourage a corporate culture that supports compliance with FHN's Compliance Plan and Code of Conduct, and
- To monitor and enforce our compliance with state and federal laws and regulations, as well as other health plan requirements

WHAT DO I NEED TO KNOW ABOUT THE FHN COMPLIANCE PROGRAM?

The main purpose of the program is to educate and enable employees and business associates to comply with all of the legal and ethical standards we are bound to follow. These standards are set by:

- Federal, state and local governments
- Food and Drug Administration (FDA)
- Occupational Safety and Health Administration (OSHA)
- Centers for Medicare and Medicaid Services (CMS)
- Insurance companies

The specific rules and regulations you need to follow depend on where you work and what your responsibilities are. The regulatory guidelines that affect FHN influence our activities from how we dispose of medical waste to how we bill for services. The most important thing that you can do as an employee is to make sure that your work conforms to your department's policies and to the FHN Compliance Plan. **Compliance is everyone's responsibility**, regardless of job or position.

FHN'S COMPLIANCE CODE OF CONDUCT

FHN is the largest and most influential provider of healthcare in our community. It is a tax exempt, charitable organization. The people we serve trust us to provide the highest quality care with compassion. We have earned the community's trust by demonstrating our commitment to ethical and honest business conduct. To maintain that trust, we must continue to follow existing laws and regulations as well as our internal guidelines, policies and procedures. Employees of FHN are **essential** to our compliance efforts. The FHN Compliance Plan and the Code of Conduct apply to everyone. Your primary responsibility is to follow the Code of Conduct, no matter what your job may be. The elements of the Code include:

- Commitment to serve others by treating them with respect and being a team player;
- Accountability for our individual behavior;
- Providing service with integrity and honesty;
- Cooperation with progressive change and continuous improvement; and
- Education of ourselves and the public to learn and grow.

Be familiar with the policies and procedures that apply to your specific job, as well as the rules which apply to the whole organization. Each employee is expected to understand the difference between right and wrong. If you have questions about any compliance matter, you may refer to policy and procedure manuals, your supervisor or manager, in-service training or the FHN Compliance Officer. A few examples of compliance issues are outlined in this brochure.

PATIENT CONFIDENTIALITY

The patient's right to privacy and confidentiality is a concern for all employees every day. There are federal (HIPAA) and state laws that govern the use and release of health information. Regardless of what your role is, there may be times when you come into contact with information about a patient's care and treatment. This can happen through things you hear or see while doing your job or through access to our electronic systems. There are only certain times when this information can be disclosed or transmitted. Be familiar with FHN's policies on confidentiality of patient information. Only use or release it if you are



permitted to and use or release only the **minimum amount** of information to accomplish the task (Minimum Necessary rule). Patient information should not be discussed in public areas. Medical records or other patient information should not be left out on counters where they can be viewed by people passing by.

YOU REPRESENT FHN

You are expected to act ethically and in the best interest of the organization. That means that you do not use your position for any personal gain other than your salary or benefits. As an employee, you should not do anything that would cause harm to the organization's business or reputation. You may not use the resources of the organization for personal use, and any information you may learn about the business plans or strategies of FHN is not to be discussed outside of work.

IF YOU SEE SOMETHING, SAY SOMETHING

Employees of FHN are the “eyes and ears” of the organization to detect any violations of our Compliance Program. You are expected to report anything that you encounter at FHN which you believe might be unethical, illegal or fraudulent. FHN has **zero tolerance** for unethical, illegal or fraudulent behavior. Any employee behaving in this manner will be subject to corrective counseling, which can include termination.

If you suspect that there is a compliance problem, you should report it. Reports should be made either in person, by telephone or in writing to any of the following:

- Your supervisor or department director
- The FHN Compliance Officer: 815-599-6116
- **The FHN Compliance Hotline:**
 - **By phone at:** 877-874-8416
 - **On-line at:** www.fhn.silentwhistle.com

The **FHN Compliance Hotline** is available to all employees to discuss concerns about possible unethical, illegal or fraudulent behavior. This phone line has been set up for the **confidential** reporting of possible compliance issues. When you call, you do not have to give your name. All reports will be investigated, and when appropriate, corrective action will be taken.





WHAT DOES FHN WANT ME TO REPORT?

There are many types of issues that you may have concerns about and which should be reported in any available manner. **Your help** in reporting any issues **is essential**. Some reportable concerns include:

- Patient safety
- Staff safety
- Quality of care
- Unsafe or disruptive staff behavior
- Improper billing, including billing for services not delivered
- Conflicts of interest
- Upcoding or undercoding
- Improper referral of patients
- Kickbacks
- Violations of patient confidentiality
- Illegal activities on FHN premises

There will be **no retaliation** against an employee for a **good faith report** of actual or possible violations. Efforts will be made to keep the identity of the reporter confidential to the extent permitted by law unless it prevents a full or thorough investigation of the report.

However, any staff member who fails to follow known policies or regulations will be subject to disciplinary action per Human Resources policies and procedures or Medical Staff bylaws. Any non-compliant behavior by a vendor, contractor or any other business associate of FHN may result in the termination of contractual relationships.

- C** Maintain **Confidentiality** of health information
- O** **Obey** all laws and regulations
- M** **Monitor and Audit** organizational compliance
- P** Follow FHN **Policies and Procedures**
- L** **Listen** to other staff and patients
- I** Act with **Integrity** and honesty
- A** You have **Accountability** for behavior and use of FHN resources
- N** **NO retaliation** for good faith reporting
- C** Follow the **Code of Conduct**
- E** **Ethical and fair** business practice
- M** **Minimum Necessary** Rule
- A** Maintain **Appropriate Business Relationships**
- T** Be a **Team Player** when dealing with others to reach goals
- T** FHN is a **Tax Exempt** charitable organization that acts ethically
- E** Regular and **Effective** compliance **Education**
- R** **Respect** for patients and staff
- S** If you **SEE SOMETHING, SAY SOMETHING**

FHN COMPLIANCE PROGRAM

COMPLIANCE **MATTERS**

The FHN Compliance Hotline:

- By phone at: 877-874-8416
- On-line at: www.fhn.silentwhistle.com

www.fhn.org



We're here. For you.

FHN