



Saint Joseph's Medical Center
Compliance Program

The Compliance Program at Saint Joseph's Medical Center aims to help staff understand constantly changing health care laws and regulation in order to stop problems from occurring and to resolve any issued that may arise. The goal of the program is to prevent and detect waste, fraud and abuse.

Policies and procedures are maintained to guide staff in carrying out their duties in compliance with legal and ethical requirements. We exercise sound judgement, care and diligence and are guided by the highest standards of ethics for Saint Joseph's mission, vision, and values.

"Compliance is everyone's responsibility"

This means that everyone participates in the Compliance Program by participating in compliance education, reviewing our Code of Conduct, and remaining aware of policies and procedures. Awareness creates knowledge, which is a key to successfully creating an environment of accountability.

Reporting concerns so they are properly addressed is everyone's responsibility, regardless of position. If a concern is identified but is not reported, there is the potential for that concern to remain "undetected". This can place staff or the organization at risk.

The Compliance Committee members can carefully assess all facts without bias and evaluate the process or system at issue to determine the necessary response, thus ensuring that the regulations and standards are met and that matters are handled consistently and fairly.

Being accountable for compliance is different depending on our roles within the organization. Sometimes it's about following a policy to make sure we comply with new or revised regulations. For some, it is also a responsibility to be aware of and maintain licensing requirements, professional practices standards, or financial requirements.

Code of Conduct

All staff and providers of all entities and campuses of Saint Joseph's Medical Center are expected to be familiar with and adhere to SJMC Compliance Code of Conduct, as well as specific policies, procedure and rules that apply to their positions and to SJMC's participation in state and federal programs. Everyone has a duty to report any suspected violations of the Code without fear of reprisal. Supervisors are expected to detect and act upon any violations.

Integrity is central to the SJMC philosophy of care and dedication to the community.

This Code affirms our commitment to the highest standards of ethics, professional service and quality healthcare as well as our steadfast compliance with all legal and regulatory requirements. It is the framework on which specific institutional policies and procedures are established.

Quality of Care

We are committed to providing high-Quality compassionate care to our community.

Single High Standard of Care: Patients with the same healthcare needs receive the same quality of care throughout entities and campuses of SJMC

Credentials: Professional staff conducts their practices within the scope of their licenses and the privileges accorded to them.

Patient's Bill of Rights: This guides all behavior toward patients and their families. Patient rights are emphasized in employee orientation and periodic staff education. Information is published in the admission packet and posted in public areas.

Grievances: We recognize that patient, family, visitors, community members have the right to register complaints or grievances without fear of reprisal. WE acknowledge all concerns promptly and investigate and resolve all grievances to the fullest extent possible.

Alternative Facilities: We respect the patient's freedom to choose facilities for their care and inform them about appropriate alternatives and whether they are related to SJMC services

Discharge: We will not transfer or discharge any patient from the medical center except in accordance with a safe discharge plan, regardless of source of payment. We never deny urgent or emergent care based on a patients' ability to pay for services.

Deficit Reduction Act

SJMC is committed to complying with the requirements of the Federal Deficit Reduction Act of 2005 and to preventing and detecting any fraud, waste or abuse in the organization. All staff, including management, physicians, consultants and vendors who provide services, must comply with all applicable federal and New York State false claims laws and regulations.

Federal and state false claims provisions: In compliance with these provisions, SJMC prohibits any staff from knowingly submitting to any federal or state-funded program a claim for payment approval that includes fraudulent information or is based on fraudulent documentation.

All staff has a duty to notify the Compliance Officer or supervisor of any suspected fraud, waste or abuse. Additionally, staff should consult with the Compliance officer if they have questions related to how these laws apply to their job. There is a compliance hotline (914) 378-7988 or email compliance@saintjosephs.org that can be used to report any compliance concerns.

Any staff member who reports such information has the right and opportunity to do so anonymously and will be protected against retaliation for coming forward under both SJMC's internal policies and federal and state law. However, SJMC retains the right to take appropriate action against a staff member who has participated in a violation of federal or state law or hospital policy.

If a staff member believes that the hospital is not responding to his or her report within a reasonable period of time, the employee shall bring these concerns to a member of the Compliance Committee. Failure to report and disclose or assist in an investigation of fraud and abuse is a breach of the employee's obligations to SJMC and may result in disciplinary action.

Information Privacy and Security

We protect the confidentiality of patient health information and SJMC internal information. This applies to information about patients, staff, and research and business affairs. It also applies no matter whether the source of information is spoken, written, or electronic.

Patients and families trust us with highly personal and sensitive information regarding their medical conditions. We realize the sensitive nature of this information and are committed to protecting patient privacy. We are committed to complying with state and federal laws.

- We do not access or use patient information except as necessary to perform our jobs.
- We access, use and disclose only the minimum amount of patient information needed to perform our jobs.
- We do not discuss patient information with others who do not have a job-related need to know, including co-worker, colleagues, family and friends.
- We do not speak with or provide any information to the media or allow media to be present in a patient care area without notification and approval from the Vice President of External Affairs.
- We do not share our User ID or passwords to our electronic systems, and we log off when we step away from our workstations.
- We assess our surroundings when speaking with or about patients and speak quietly, always asking patients for permission to speak freely when a family or friends are present.
- We verify written patient information to ensure that we do not mix one patient's information with another's that fax numbers are accurate and entered correctly, and that patient labels are correct.

Information Privacy and Security (continued)

- We dispose of written patient information in confidential disposal bins.
- We do not send emails containing patient information using personal email accounts. We encrypt all emails containing patient information.
- We report all privacy concerns for potential violation immediately to the Privacy Officer
- We report all information security concerns or potential violation immediately to the Information Systems Security Officer.
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Patient Rights and Sensitivity: SJMC marketing and advertising activities are conducted with sensitivity to patient rights.

Social Media: We respect the privacy of patients. Staff follows hospital guidelines when engaging in social media. We do not mention or make reference to any patients on social networking sites or blogs.

Conflicts of Interest

All institutional decisions are made fairly and objectively, without favor or preference based on personal consideration.

Avoiding and Disclosing Conflicts: In performing our responsibilities, we avoid any perception of impropriety or bias.

Areas of Conflict: In business relationships if there is a conflict, or even an appearance of conflict, it is our duty to immediately disclose such a situation to a supervisor, manager, or the Compliance Officer.

Gifts: We do not ask for or accept any gifts in exchange for services. Common sense should tell you when a gift is improper and should be refused to prevent embarrassment and avoid what may be an unintentional violation of the law. Gifts of money are not accepted under any circumstance. Gifts are never given to government employees in connection with business transactions, even if the intent is not to influence and official actions. All gifts to SJMC are processed through the External Affairs department.

Political Activity: As a tax-exempt corporation SJMC is prohibited from engaging in political activity and does not make campaign contributions or endorse candidates. Political campaign contribution may not be solicited on the premises. SJMC resources (stationary, tax, telephone, or email) may not be used for political campaigns.

Referrals and Inducement: We do not offer or receive kickbacks or improper inducement to influence our decision regarding patient referrals and or purchased o supplies or services. No free goods, service, discounts, rebates or allowances are accepted without prior approval of the Purchasing Department.

Illegal Payments: No one at SJMC makes or authorizes illegal payments or bribes to anyone, or authorizes any use of resources that, even if not illegal, could be interpreted as improper.

Billing and Coding Integrity

Coding and billing processes are performed in accordance with all local, state and federal regulation and third party payer contracts. Services are billed with codes that accurately describe the care provided and are supported by documentation in the medical record.

Actual and Medically Appropriate Services: We will only bill for medically appropriate services performed by properly licensed individuals

Documentation of Services: We document all patient care services in an accurate, legible, and timely manner consistent with all documentation, coding and billing requirements

Electronic Health Record Documentation: We follow federal, state and local guidelines and maintain compliance as it relates to care rendered and documented within the electronic health record (EHR), including but not limited to appropriate access, authorship, timeliness of entry, and use of EHR functionality such as copy/paste, cloning etc.

Coding and Claim Preparation: We prepare claims for services using appropriate codes that accurately describe the care provided and documented in the medical record. We do not engage in any inappropriate coding techniques that would result in a classification and payment greater than one that reflects the service actually performed (up coding). We do not improperly bill for services separately that are required to be billed together (unbundling). We bill for services provided to patients that are transferred to other facilities as transfers, not as discharges.

Billing by Teaching Physicians: When both residents and teaching physicians are involved in patient care, the teaching physicians are present during the key portion of the service (the critical portion) and assure that their presence is documented in accordance with local, state, and federal guidelines.

Billing for Clinical Trials: We bill third-party payers for those items/services that are considered standard of care and that are not covered by the sponsor. In accordance with applicable laws, rules and regulations, we bill the sponsor/grant for all items and services rendered for research purposes only.

Effective Communication: Clinical and billing staff effectively communicates with each other to ensure correct coding and billing of all services rendered.

Accurate Cost Reporting: We prepare Medicare and Medicaid cost reports in compliance with local, state and federal requirements.

Corrective Action Policy: When coding and or billing errors are identified, applicable corrective action is taken, including refunding of any overpayment. As in the case of any other violation or error, corrective action for coding and or billing errors includes taking steps to prevent recurrence.

Questions: When questions and concerns are raised regarding documentation, coding and billing, they are raised and reported up through the chain of command to the Compliance Officer or anonymous reporting as desired.

Human Resources

All employment decisions are based on the individual merit, personal qualification and ability of the applicant to perform the job.

Equal Employment Opportunity: SJMC does not discriminate in any employment decisions on the basis of race, creed, color, national origin, ancestry, gender age, disability veteran status, marital status, sexual orientation, gender identity or expression, genetic predisposition or carrier status, alienage or citizenship status.

Harassment: We provide a work environment that enables everyone to work with security and dignity, free from unwelcome, insulting, degrading or exploitive treatment or harassment. An Equal Employment Opportunity (EEO) Coordinator can receive, investigate and resolve any complaints of discrimination or harassment.

Verification of qualifications: We hire qualified individuals with proper expertise, licenses and experience. Qualifications are verified in connection with offering employment.

Employment of Family Members: We hire the most qualified candidate for any position, without preference to relatives of staff. To ensure objectivity, relationships of a personal or family nature between supervisors and those they supervise are prohibited. Where such relationships exist, they must be disclosed to the Vice President in charge of the area.

Respect for Cultural Values and Religious Beliefs: We value diversity and treat patients, families, visitors, staff, and all others with respect and dignity. We acknowledge that aspects of patient care may conflict with a staff member's cultural values, ethics or religious beliefs. Human Resources policies provide a mechanism to address general concerns and specific requests to abstain from participating in any aspect of patient care on this basis.

Safeguarding Assets

SJMC protects organizational resources, including facilities, equipment, funds, information and data against loss theft and misuse. Staff uses resources responsibly for the purposes of SJMC activities. These resources may not be used for personal benefit.

Use of Funds: SJMC only utilizes funds for legitimate business purposes. When staff submits payment requests, they provide all required supporting documentation and approvals. Expenditures of funds are recorded and accounted for in an accurate and timely manner.

Employee Issues and Concerns: If you become aware of an activity that you think may be a problem, or if you have any questions about the Compliance Code of Conduct, please contact your supervisor immediately.

You may contact a member of the Compliance Committee:

Frances Casola

Frank Hagan

Deborah DiBernardo

Margaret Cusumano

Dean Civitello

Lisa Hanrahan

Joseph Di Giovanna

Sonia Velez, M.D.

Kim Pagan

Jennifer DeMeo

Janice Cordola

You may contact the Compliance/Privacy Officer at (914) 378-7514, or send a fax to (914) 965-4838.

You may send an email to compliance@saintjosephs.org