CHI Health
Corporate Responsibility Program
Objectives

- Why do we have a corporate responsibility program?
- What does the corporate responsibility program do?
- Who makes up the corporate responsibility team?
- Where can I get more information on corporate responsibility?
- How can I ask questions or report a concern?
Why do we have a corporate responsibility program?
Key Elements of an Effective Corporate Responsibility Program

- Written standards of conduct
- Designated corporate responsibility officer
- Compliance committees
- Education and training programs
- Complaint reporting and response process
- System to respond to allegations of wrongdoing
- Investigation and corrective action
- Audit and monitoring systems
- Measurement of program effectiveness

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What is a Corporate Responsibility Program?

- Founded on our core values and standards of conduct
- Promotes a culture of honest and ethical behavior
- Provides resources for decision making
- Helps us understand and comply with complex laws and regulations
- Works proactively to prevent & detect risks related to increased government regulations and enforcement efforts
What does the corporate responsibility team help with?

- Compliance, regulatory and privacy education and training
- EMTALA questions/concerns
- Stark Law/ Anti-kickback Statute
- Antitrust compliance
- False Claims Act
- Billing Issues

- Improper or incorrect documentation for billing
- Conflicts of Interests
- Potential or actual disclosures of PHI
- Medically unnecessary services
- Misuse of Company Assets
Where do I go to get more information?

- CRP Team
- Other Resources
  - Our Values and Ethics at Work (OVEAW) Reference Guide
  - Standards of Conduct
  - Corporate Responsibility Policies
    - CRP Policy #1 Gifts and Payments from Business Sources
    - CRP Policy #2 Physician Non-Monetary Compensation Database
    - CRP Policy #3 Screening for Excluded Providers
    - CRP Policy #4 Advertising and Marketing: Referral and Business Sources
  - OVEAW Posters
  - Government Contact Protocol Card
How can I get help?

- As an organization and as individuals, we are responsible for promptly reporting potential violations of law, regulation, policy or procedure.
- You are protected from retaliation if you make a good-faith report, complaint or inquiry.
- If you are unsure about how to respond to a particular situation, you can use the Catholic Health Initiatives reporting process.

Catholic Health Initiatives Reporting Process:
- Speak with your supervisor or another manager.
- If the supervisor/manager is not available, or you are not comfortable speaking with him/her, or you believe the matter has not been adequately resolved, contact your human resources representative.
- Contact the Corporate Responsibility Officer
- Call the Ethics at Work Line
  - 1-800-261-5607
  - File your report at www.ethicspoint.com