

Integrity and Compliance Program

Annual Training 2025



Choose Your Learning Path

To begin your training, choose the learning path that matches your current career path.

Clinical Leader

"I lead people who deliver health care services." *Ex.: nurse supervisor*

Clinical Colleague

"I deliver health care services."
Ex.: nurse, respiratory therapist, phlebotomist

Non-Clinical Leader

"I lead people who do not deliver health care services." *Ex.: office manager, health information director*

Non-Clinical Colleague

"I do not deliver health care services."
Ex.: housekeeping, marketing specialist

Course Navigation

How to move around:

You can use the **Forward** and **Backward** arrow buttons to navigate.

There's no audio in this course.

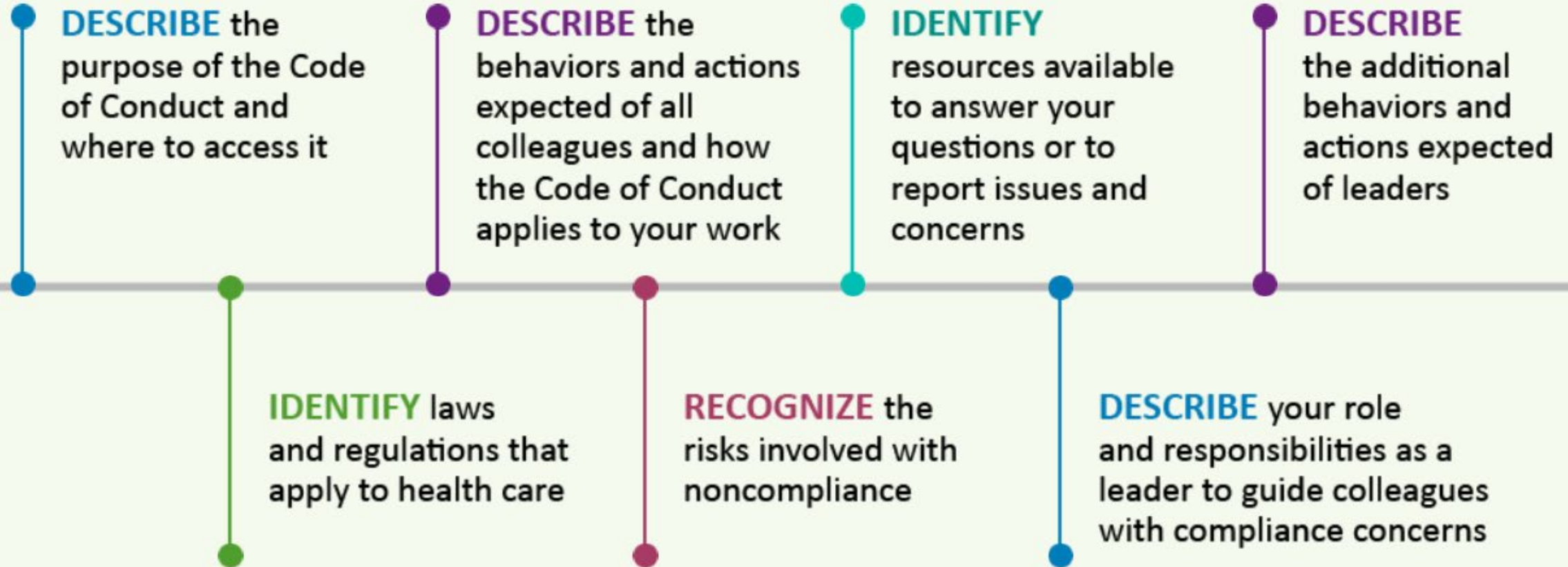
No need for headphones – just read the screen and **click whenever you see a pointer icon.**

Try it now! Click the sticky note to read a quick fact!

*ICP stands for
Integrity and
Compliance
Program*

What are we doing here today?

When you're finished with this eLearning, you should be able to:



Trinity Health's Integrity and Compliance Program



Trinity Health operates an Integrity and Compliance Program to:

- Assist colleagues in understanding and following the laws, regulations, professional, and ethical standards that apply to our health care ministry
- Prevent, detect, and correct integrity and compliance issues that may arise in our operations



The Integrity and Compliance Program provides resources and tools including:

- The Code of Conduct
- Policies and procedures
- Education and training programs
- Reporting systems to report issues and concerns and seek answers to questions

Trinity Health's Integrity and Compliance Program

Trinity Health's Integrity and Compliance Program includes seven requirements for an effective compliance program.

Learn more about the Integrity and Compliance Program by clicking each area.

CLICK EACH →



Trinity Health's Integrity and Compliance Program

Code of Conduct/Policies:

The Code of Conduct describes behaviors and actions expected of all who work in Trinity Health.

CLICK EACH →



Trinity Health's Integrity and Compliance Program

Effective Lines of Communication:

Resources to answer questions or to report issues and concerns, including your Integrity & Compliance Officer and the Integrity & Compliance Line.

CLICK EACH →



Trinity Health's Integrity and Compliance Program

Response & Corrective Action:

Monitoring & responding to identified issues and taking actions to correct and prevent the recurrence of problems.

CLICK EACH →



Trinity Health's Integrity and Compliance Program

Enforcement Standards:

Everyone is held accountable for supporting the Integrity and Compliance Program and following the Code of Conduct.

CLICK EACH →



Trinity Health's Integrity and Compliance Program

Leadership & Oversight:

Your Ministry has appointed an Integrity and Compliance Officer to lead the program in your Ministry.

CLICK EACH →



Trinity Health's Integrity and Compliance Program

Training & Education:

Providing training programs to assist colleagues in understanding the laws and regulations that apply to their work.

CLICK EACH →



Trinity Health's Integrity and Compliance Program

Risk Assessment, Monitoring & Auditing:

Monitoring changes in laws and regulations and risks to our operations on a regular basis and auditing operating activities to ensure continued compliance with laws, regulations, and professional standards.

CLICK EACH →

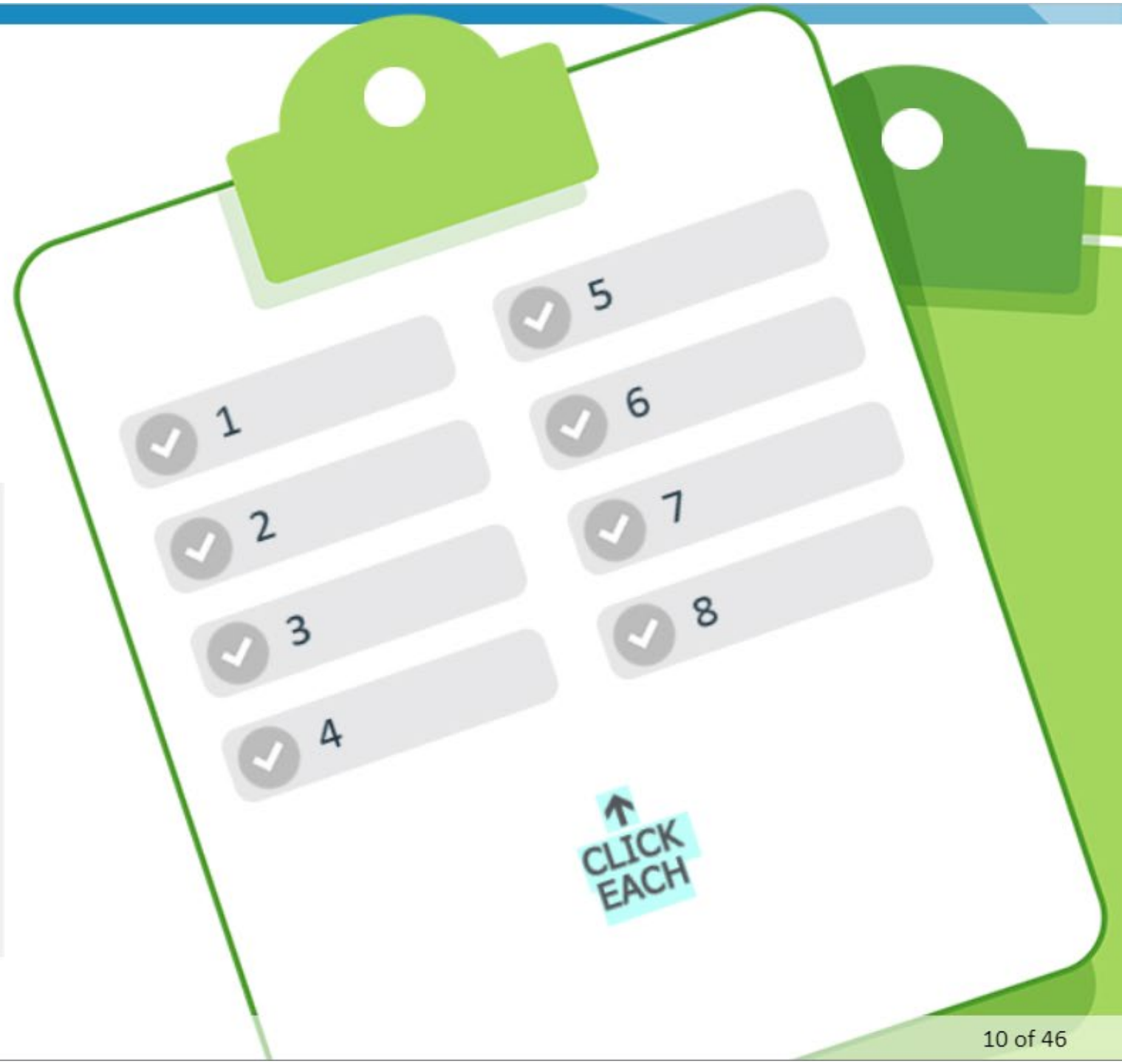


Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

Learn more by clicking on each area.



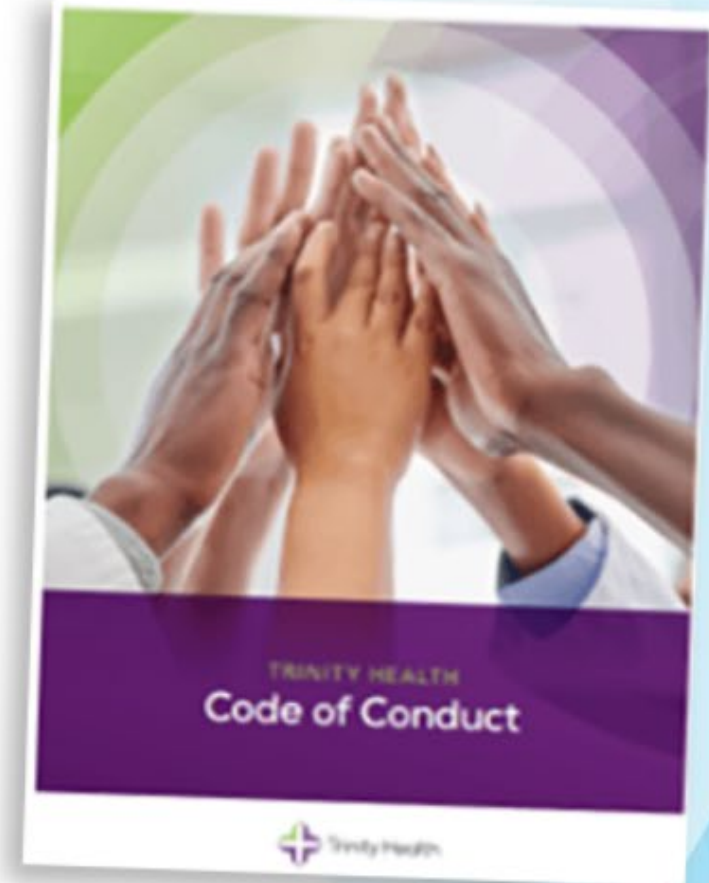
The Code of Conduct: What it is and how to find it

The **Code of Conduct** describes actions and behaviors expected in our everyday relationships with:

- Those we serve, including patients, residents, family members and our communities
- Colleagues and others who serve with us
- Suppliers and other business partners; and
- Those who pay for our services, including federal and state health care programs

The **Code of Conduct** was provided to you at hire. You may also obtain a copy:

- On your organization's intranet site
- From your Integrity and Compliance Officer
- From your Human Resources department



Expectations of all who work in Trinity Health

Supporting integrity and compliance is the responsibility of **ALL** who work in Trinity Health

YOU are expected to:

REVIEW AND FOLLOW
the Code of Conduct

ACT
with honesty and integrity

ASK
questions when you're uncertain
about what to do

PARTICIPATE
in training programs – like this
one – that help you understand
what's expected of you in your
role with Trinity Health

FOLLOW ALL LAWS
regulations, and Trinity Health
policies

SPEAK UP
when you're concerned about
behavior or actions that are
inconsistent with the Code of
Conduct, including potential
violations of laws or regulations

Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

1.

Treat everyone with honesty, dignity, and respect.



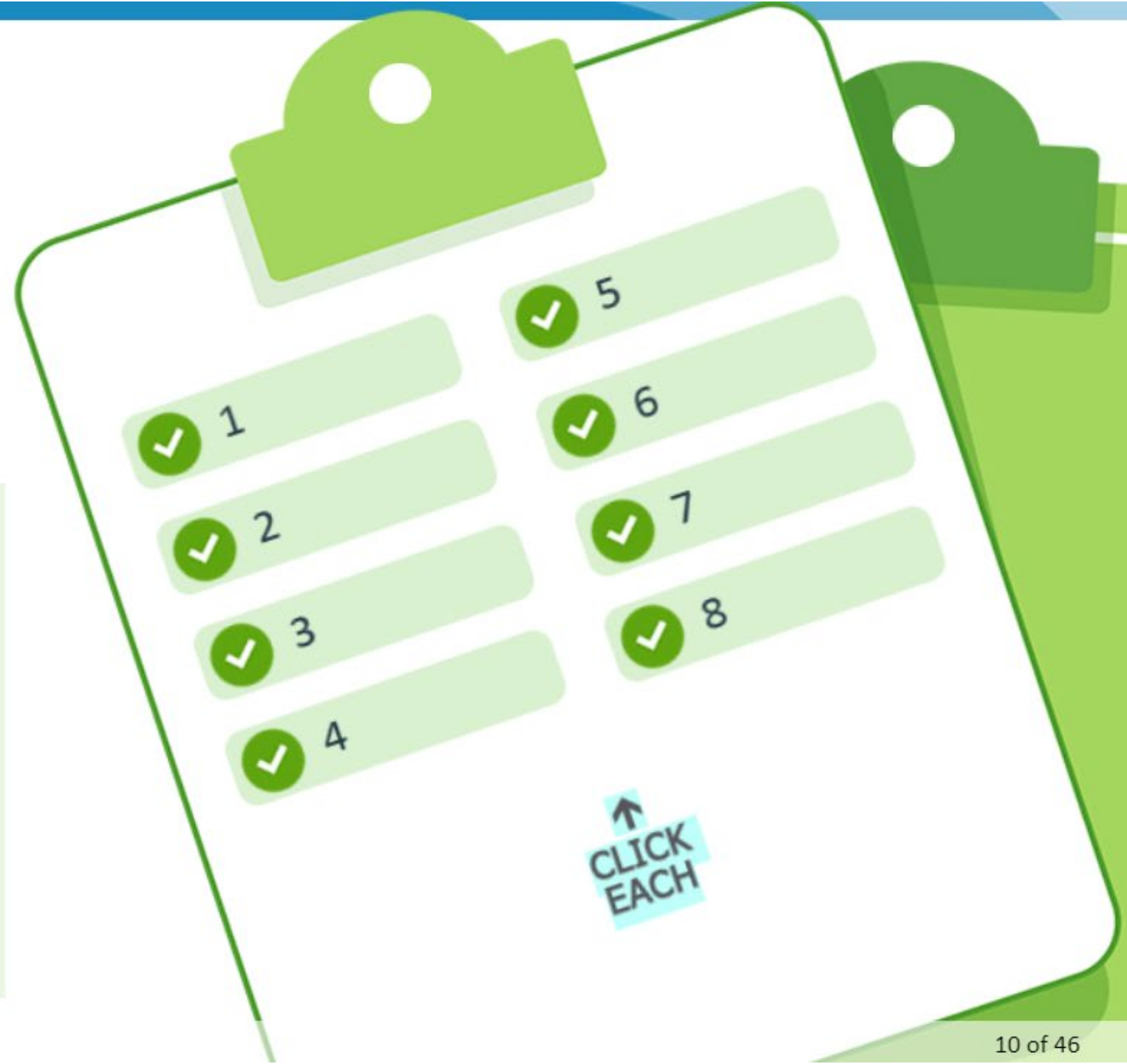
Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

2.

Anticipate and respond to requests for information and assistance in a timely manner.



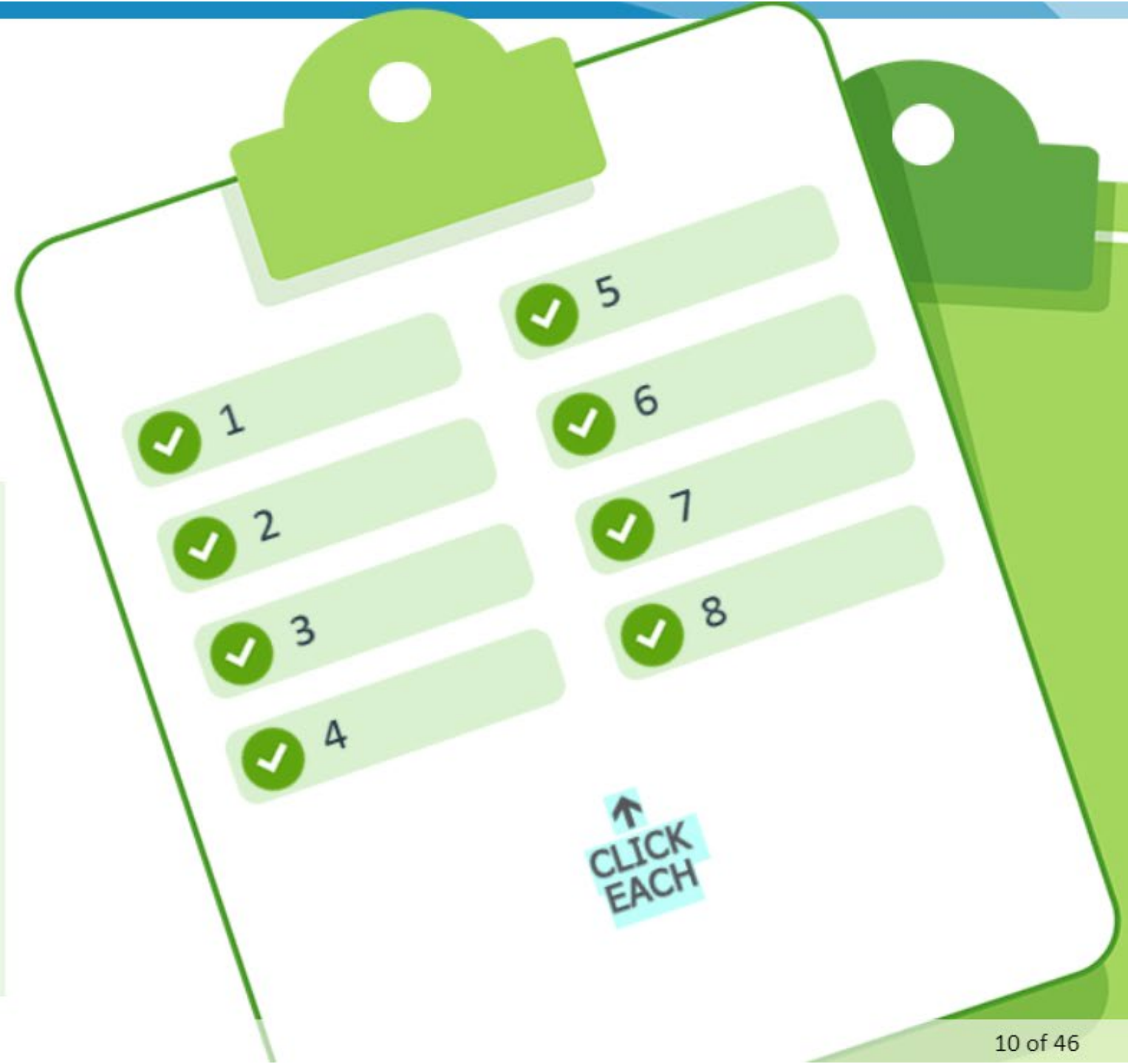
Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

3.

Speak professionally and respectfully.



Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

4.

Commit to working in a team environment.



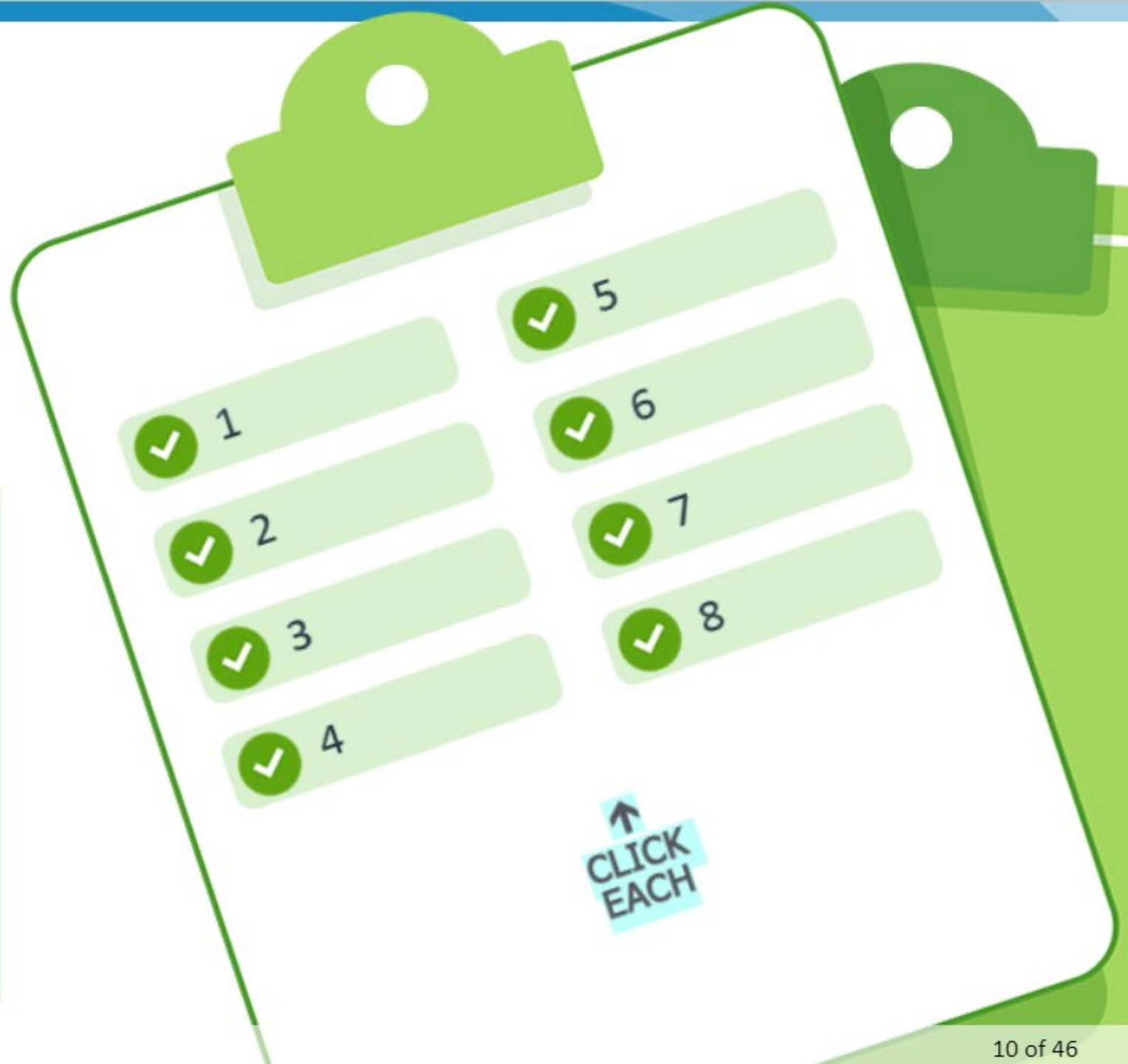
Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

5.

Respect the diversity of others and do not discriminate in any employment action based on race, color, religion, sex (including sexual orientation and gender identity), language, or any other status protected by law.



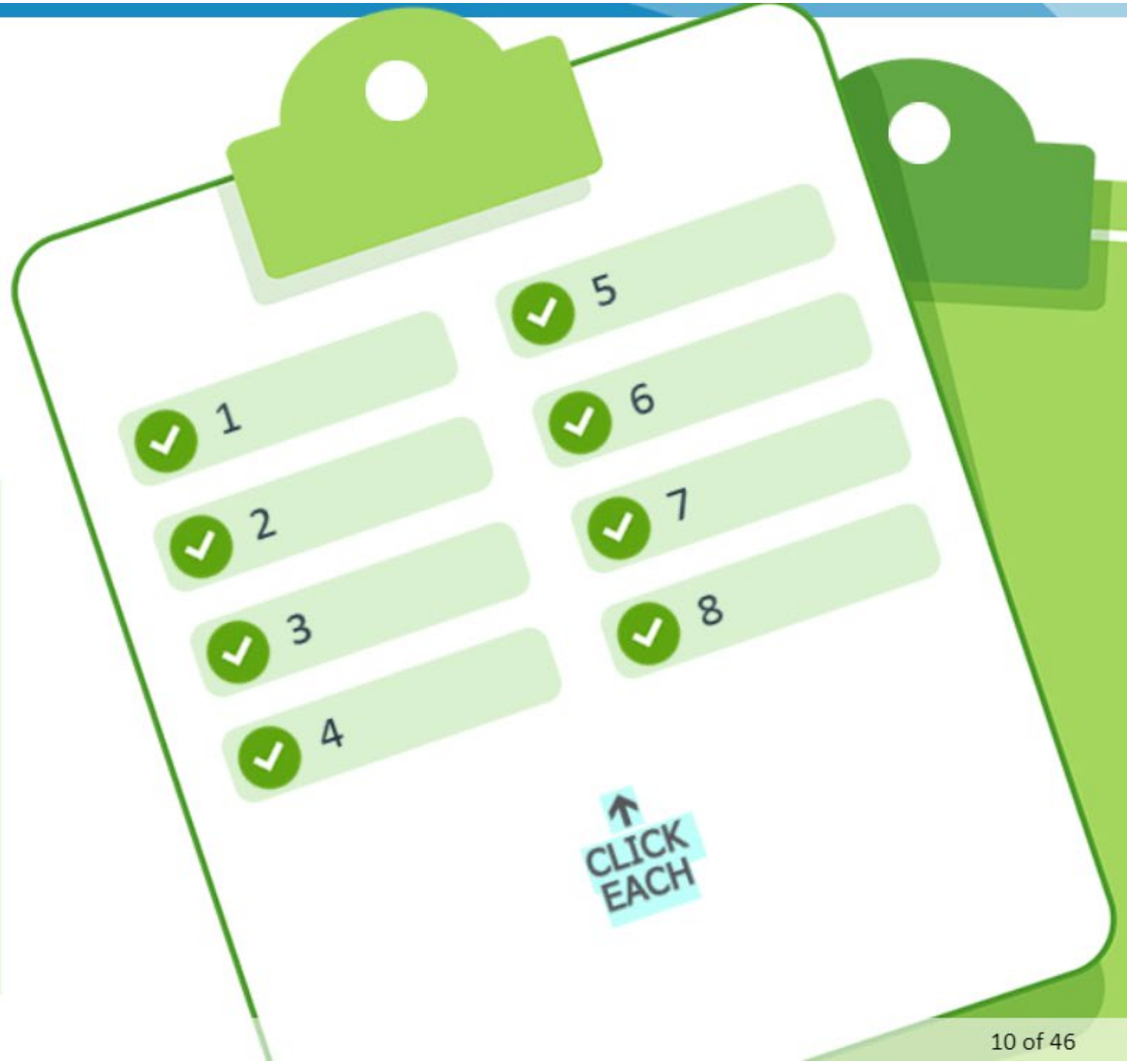
Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

6.

Abstain from behaviors that are harassing, abusive, disorderly, offensive, intimidating or disruptive.



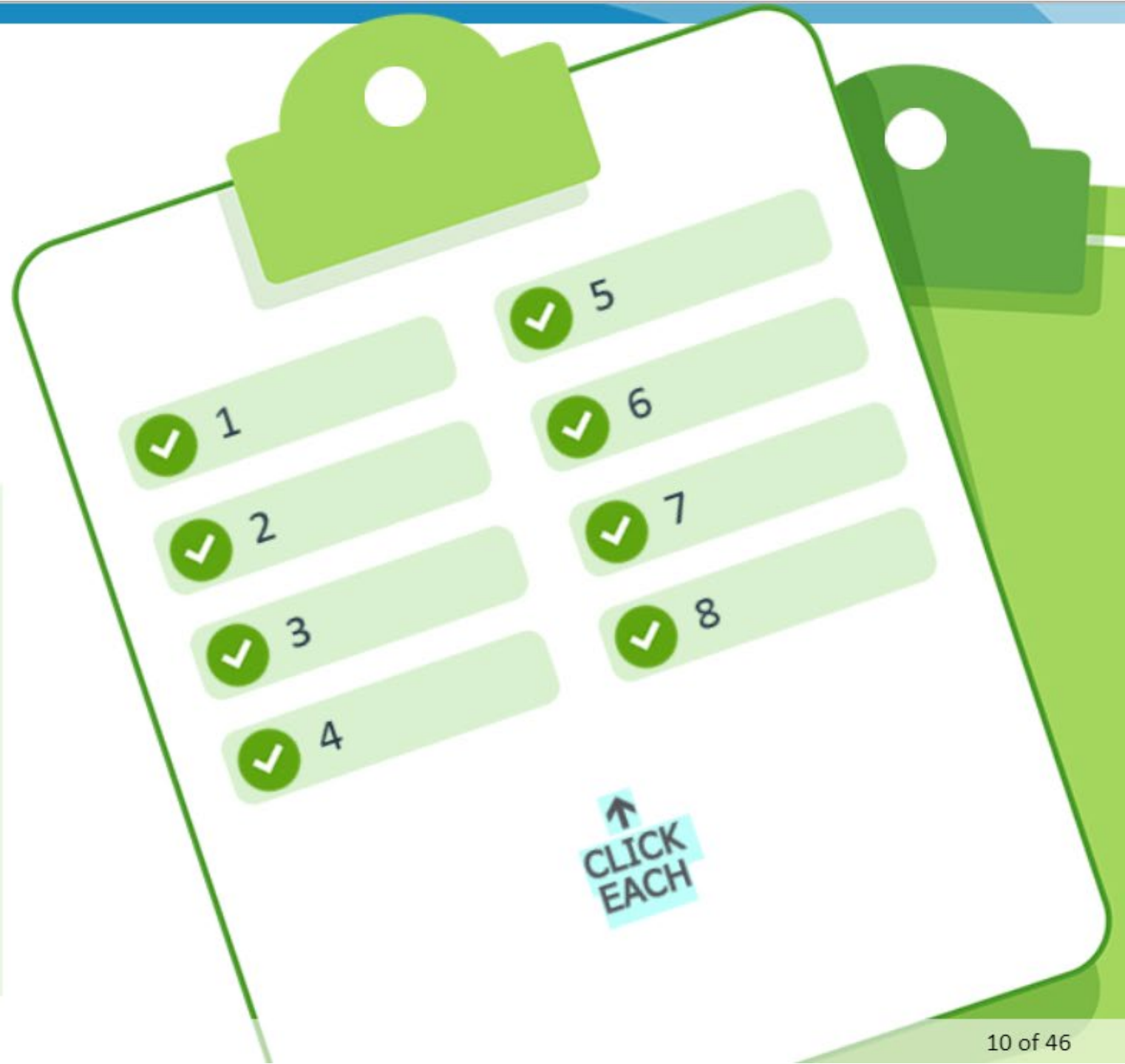
Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

7.

Report threats, threatening behaviors, acts of threats of violence or other inappropriate behavior you see.



Reverence

Our Core Value of **REVERENCE** calls us to honor the sacredness and dignity of every person.

All who work in Trinity Health are expected to:

8.

Maintain a safe working environment by performing your duties free from the influence of drugs and alcohol.



Privacy

Protecting the privacy and security of information we receive from patients, residents, and others we care for is an example of living our Core Value of Reverence. **FEDERAL AND STATE PRIVACY LAWS** require that we protect and secure the privacy of all **PROTECTED HEALTH INFORMATION**, or **PHI**, we encounter in our work.

PHI is any information about the **health status**, the provision of or payment for health care services that we create or collect as a health care entity, that can be linked to a specific individual. It includes **medical as well as insurance, financial data, and other information we receive from patients and others** in our care.

PHI is collected in many ways including **paper and electronic records, films and digital images, data files, and even in verbal discussions.**



Privacy Guidelines

Here are the guidelines you are expected to follow to protect any protected health information (PHI) you may encounter in your work.

Protecting the privacy and security of protected health information is crucial to maintaining the trust of our patients, residents, and all those we serve in Trinity Health.

Learn more by clicking on each photo.



Privacy Guidelines

Here are the guidelines you are expected to follow to protect any protected health information (PHI) you may encounter in your work.

Protecting the privacy and security of protected health information is crucial to maintaining the trust of our patients, residents, and all those we serve in Trinity Health.

1. 

Access, review, and use PHI only if necessary to do your job.



Privacy Guidelines

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Protecting the privacy and security of protected health information is crucial to maintaining the trust of our patients, residents, and all those we serve in Trinity Health.

2. 

Keep user IDs and passwords confidential.



Privacy Guidelines

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Protecting the privacy and security of protected health information is crucial to maintaining the trust of our patients, residents, and all those we serve in Trinity Health.

3. 

Secure devices, such as laptops or USB drives, as well as data files and printed materials containing PHI.



Privacy Guidelines

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Protecting the privacy and security of protected health information is crucial to maintaining the trust of our patients, residents, and all those we serve in Trinity Health.

4. 

Do not leave PHI unattended or available to others.



Privacy Guidelines

Here are the guidelines you are expected to follow to protect any protected health information (PHI) you may encounter in your work.

Protecting the privacy and security of protected health information is crucial to maintaining the trust of our patients, residents, and all those we serve in Trinity Health.

5. 

Do not discuss PHI in public areas like elevators, cafeterias, or restrooms.

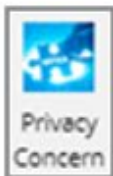


Privacy Guidelines, Continued

Here are additional guidelines you are expected to follow to protect any protected health information (PHI) you may encounter in your work.

Promptly report any privacy concerns to one of the following:

- Your Privacy Officer
- The Privacy Center of Expertise – 833.718.1043
- Privacy Concern Icon in ZENworks



Learn more by clicking on each photo.



Privacy Guidelines, Continued

Here are additional guidelines you are expected to follow to protect any protected health information (PHI) you may encounter in your work.

Promptly report any privacy concerns to one of the following:

- Your Privacy Officer
- The Privacy Center of Expertise – 833.718.1043
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1. 

Promptly report the loss or theft of any PHI including computers or mobile devices containing PHI to your supervisor or Privacy Official. (Also report lost or stolen Trinity Health devices to the TIS Service Desk.)

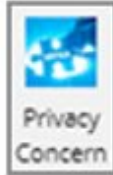


Privacy Guidelines, Continued

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2. 

Do not forward Trinity Health emails to personal email accounts and delete files containing confidential information from your Outlook mailbox.

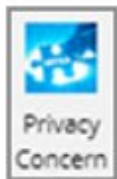


Privacy Guidelines, Continued

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Promptly report any privacy concerns to one of the following:

- Your Privacy Officer
- The Privacy Center of Expertise – 833.718.1043
- Privacy Concern Icon in ZENworks



3. 

Do not allow family members or other non-Trinity Health colleagues to use your Trinity Health/Ministry-issued device.



Privacy Guidelines, Continued

Here are additional guidelines you are expected to follow to protect any protected health information (PHI) you may encounter in your work.

Promptly report any privacy concerns to one of the following:

- Your Privacy Officer
- The Privacy Center of Expertise – 833.718.1043
- Privacy Concern Icon in ZENworks



4. 

Use Microsoft Teams file links instead of attachments where possible for sensitive information.



Case Study: Privacy and Security...

The Situation

Karen works in Registration at the hospital

- Karen's neighbor, Dee, called to pre-register for an upcoming service
- Karen went home and told her husband, Richard, about Dee's upcoming procedure
- Richard and Karen told other neighbors about Dee's condition so that they could organize meal delivery during her recovery

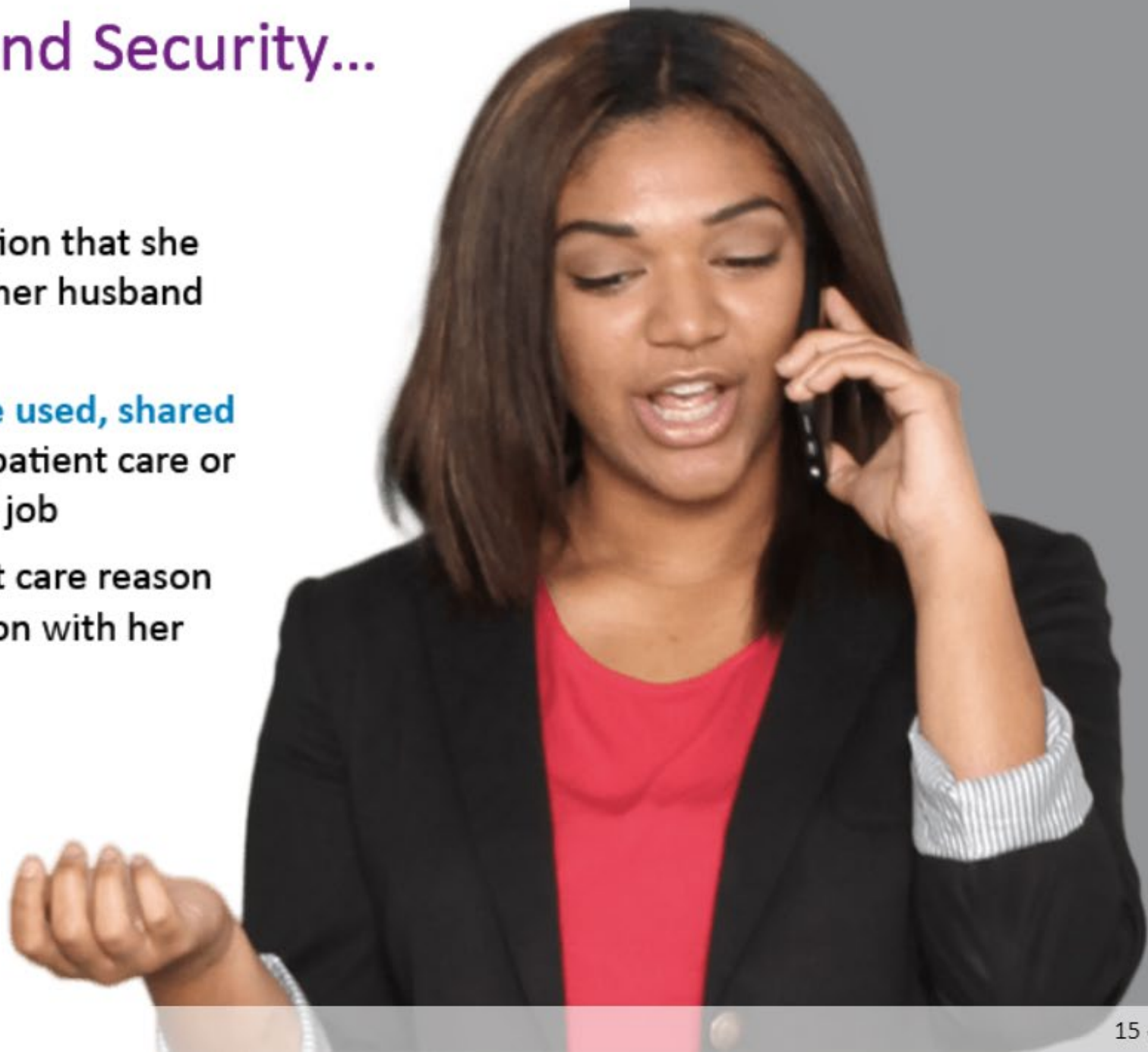
What issues do you see with Karen's behavior?



Case Study: Privacy and Security...

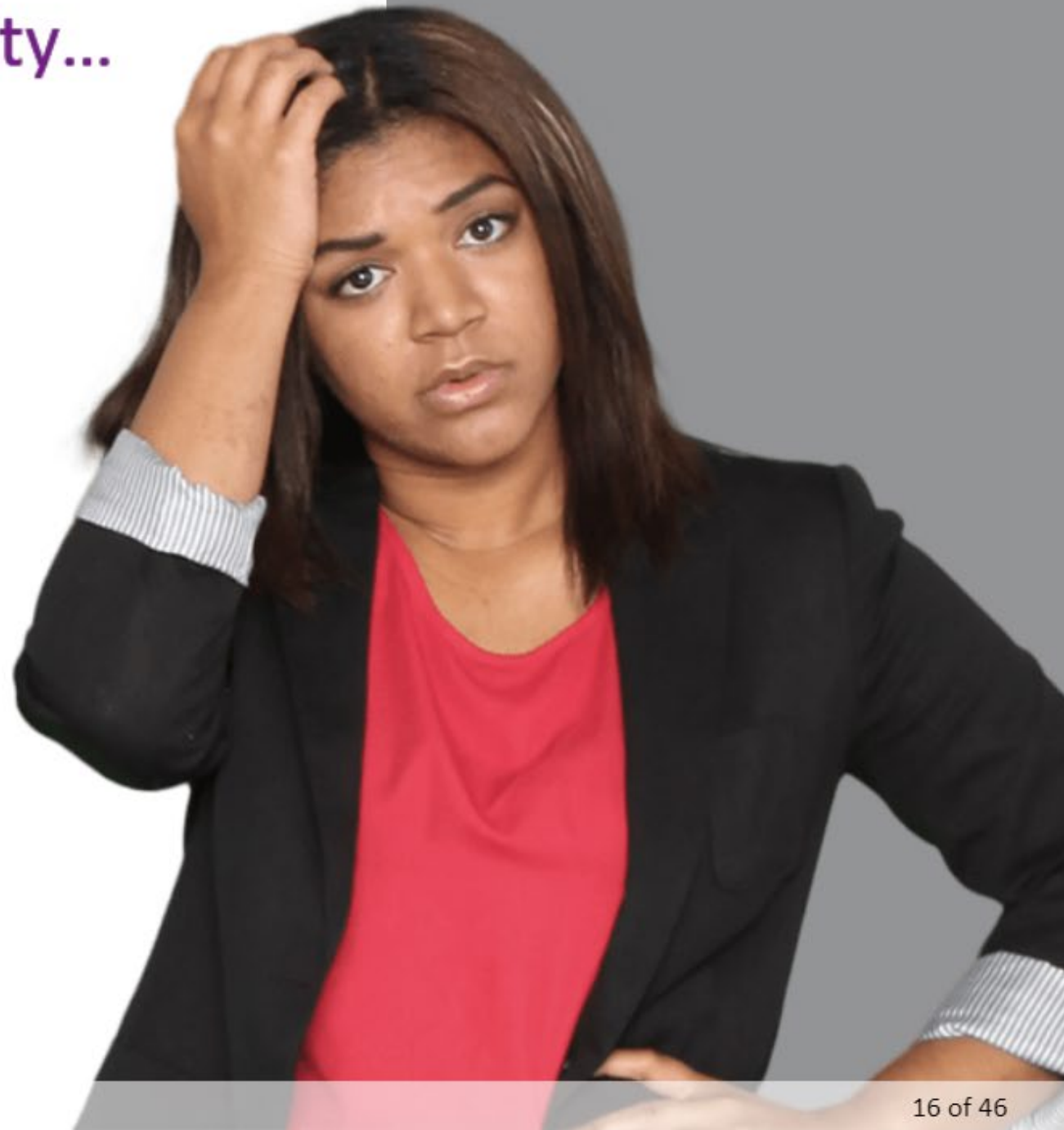
The Issues

- Karen disclosed patient information that she obtained while doing her job to her husband and to her neighbor
- **Patient information must not be used, shared or disclosed** without legitimate patient care or business reasons related to your job
- There was no business or patient care reason for Karen to share this information with her husband or neighbors



Case Study: Privacy and Security... The Consequences

- **Loss of trust** in the hospital from patients and the community
- **Potential fines** and penalties against the hospital and Karen
- **Potential disciplinary action** against Karen, including termination





Case Study: Privacy and Security... Lessons Learned

Except for legitimate business or patient care purposes permitted by law, you should **never use or share patient information with anyone**. This includes family members, friends and the patient.

If someone asks you to share private health information, consider saying, *"I'm really sorry but I don't have any information to share – it's against my organization's policies to share patient information."*

Relationships with Suppliers

CLICK →



← CLICK



Relationships with Suppliers

Trinity Health colleagues are expected to **maintain appropriate business relationships** with suppliers, contractors, consultants and others who provide goods or services.

Colleagues should **politely decline gifts from suppliers or other business partners** including invitations to social or entertainment events, meals or other items of value.

Social or entertainment events include free or discounted tickets to sporting events, theater, concerts, or golf outings.

Remember that **no gift is free** - the cost of gifts, entertainment, and meals provided by suppliers is ultimately borne in the cost of products and services purchased by Trinity Health.

Refer to the **Code of Conduct** for a discussion of limited situations where an occasional meal or refreshments may be accepted.

Contact your Integrity and Compliance Officer if you have any questions.

Conflicts of Interest

Trinity Health complies with federal and state statutes and regulations that require conflicts of interest disclosure and management processes. You are expected to **avoid situations or circumstances that could place you in conflict with your work responsibilities in Trinity Health.** A conflict of interest exists where outside activities or relationships influence, or could appear to influence, your judgment and decision-making in your role with Trinity Health.



In addition to gifts, entertainment, and meals from suppliers previously discussed, conflicts of interest can also include:



1. OUTSIDE EMPLOYMENT/OWNERSHIP: you should disclose and obtain the approval of your supervisor if you own a business or before accepting work with an outside organization that conducts business with or competes with Trinity Health.



2. DO NOT MAKE ENDORSEMENTS OR TESTIMONIALS for suppliers or other organizations doing business with Trinity Health without prior approval of your supervisor.



3. YOU ARE REQUIRED TO DISCLOSE any employment, compensation, ownership, or investment interests in companies doing business with Trinity Health.

When addressing conflicts of interest, appearances do count. **You are required to disclose any potential conflicts of interest with your supervisor.** Refer to the Code of Conduct for more information.

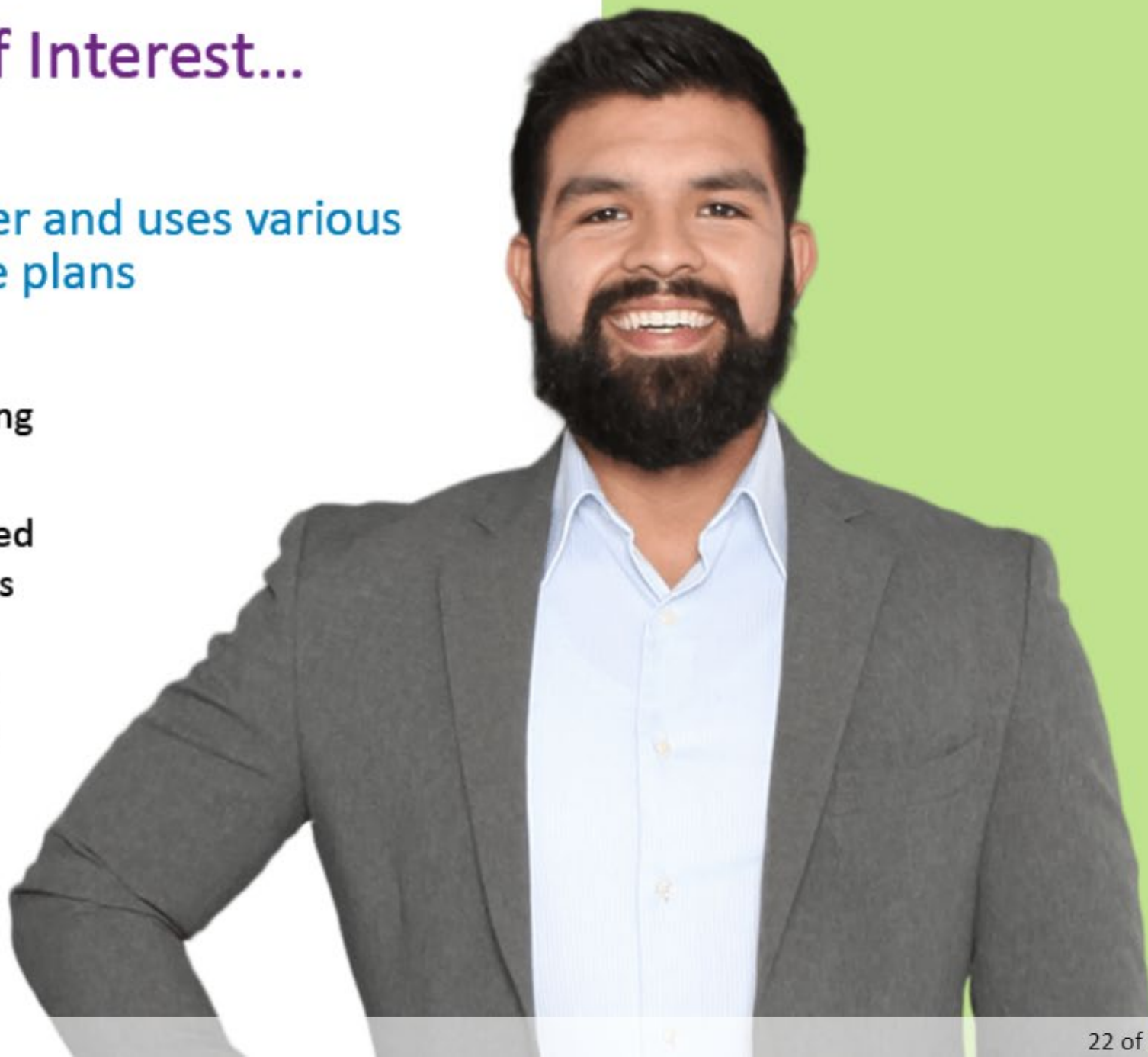
Case Study: Conflict of Interest...

The Situation

Austin is a conference manager and uses various catering services for events he plans

- His wife owns a restaurant and is bidding on a job that he is managing
- Austin signed a **CONFLICT OF INTEREST** form when he first started working at Trinity Health but thinks that because his wife owns the company in her name, it's okay, so he doesn't say anything to anyone

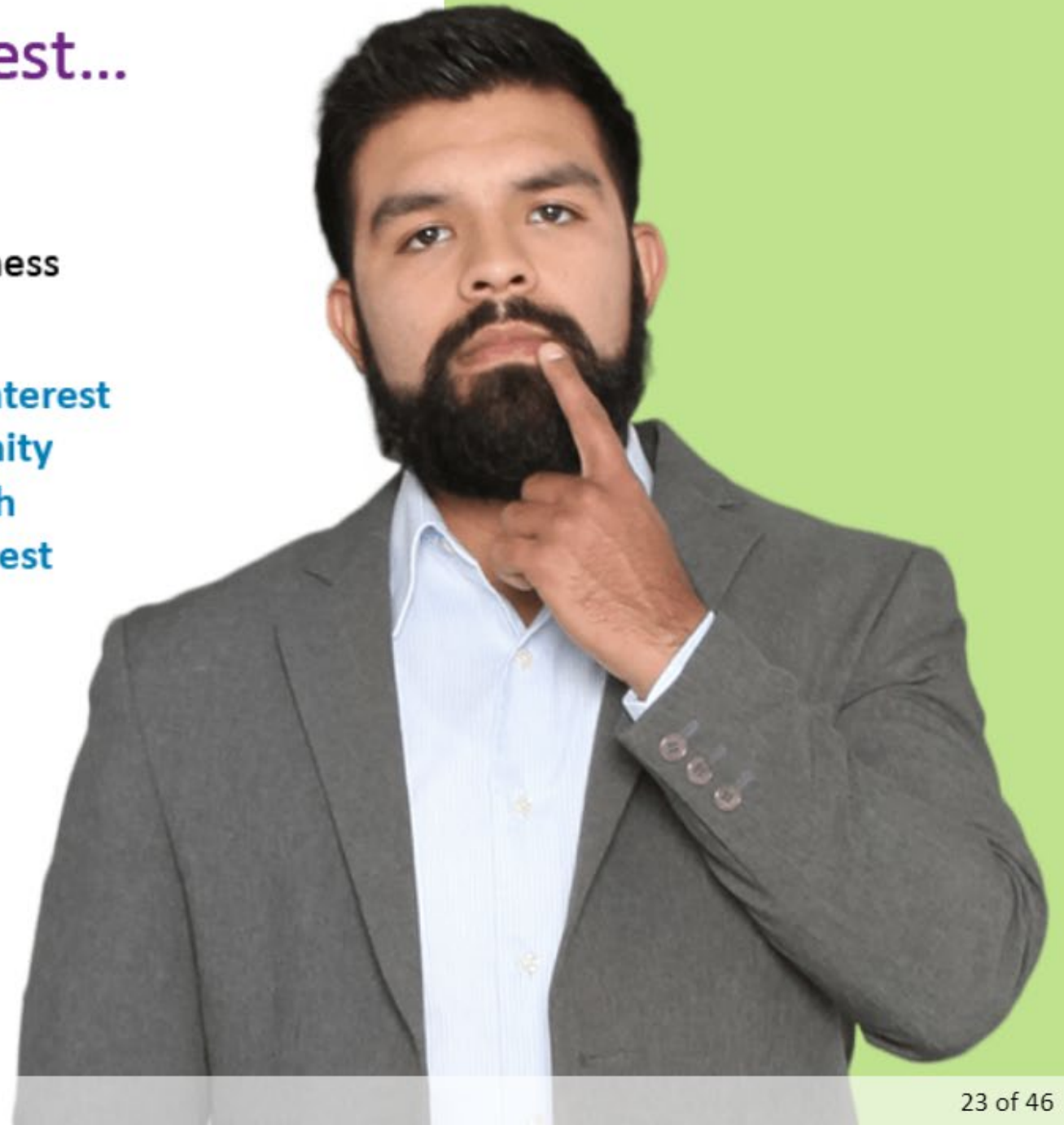
What issues do you see with Austin's behavior?



Case Study: Conflict of Interest...

The Issues

- Austin is required to maintain objective business relationships with vendors
- It's generally **considered to be a conflict of interest to do business with, or recommend that Trinity Health do business with, a company in which you or a family member has a financial interest**
- Others could question whether Austin influenced decisions regarding the vendor in the best interest of the organization or with his personal interests in mind



Case Study: Conflict of Interest...

The Consequences

- The associate **might face disciplinary actions**
- The organization's search for a new vendor may have to restart, which will **result in wasted time and money for the organization**



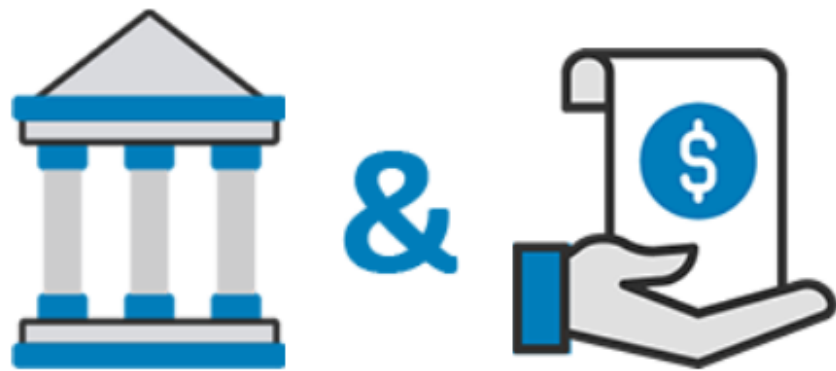
Case Study: Conflict of Interest... Lessons Learned

Austin should have brought the situation to the attention of his supervisor as soon as possible to avoid a potential conflict of interest. He could have been removed from the event or recused himself from the catering request for proposals.

A smiling man with a dark beard and mustache, wearing a light blue shirt and a grey blazer, is holding a large white sign. The background is a solid light green color.

*If in doubt,
ask for help!*

Relationships with Payers



Federal and state health care programs, such as Medicare, Medicaid and Medicare Advantage programs, as well as commercial insurance companies, pay for a majority of health care services Trinity Health provides. These payers have established specific requirements that must be consistently followed to receive payment for services



Trinity Health is **committed to complying with all laws and regulations** that apply to our health care ministry, consistent with our Core Value of Integrity.

Fraud, Waste and Abuse

There are federal and state laws to protect government health care programs, like Medicare and Medicaid, from fraud, waste and abuse.

These laws generally prohibit the following:



Submitting inaccurate or misleading claims for services



Concealing or improperly avoiding an obligation to repay amounts owed to a health care program



Submitting claims for services not provided



Offering or paying money, goods, or anything of value to encourage or reward referrals of patients



Submitting claims for medically unnecessary services

Let's review the difference between fraud, errors, waste, and abuse.

Fraud, Waste, and Abuse Defined

FRAUD

Fraud involves **intentional acts of deception** and is very serious. For example, knowingly submitting claims for services not provided.

WASTE

Waste involves **using, consuming or spending healthcare resources thoughtlessly or carelessly**, such as submitting claims for medically unnecessary services.

ABUSE

Abuse involves **questionable practices** which are inconsistent with accepted medical or business policies, such as upcoding.

ERRORS

Errors occur when **unintentional mistakes** are made on claims, reports or other information submitted to Medicare, Medicaid and other payers. This includes coding mistakes.



Trinity Health is **committed to preventing and detecting fraud, waste and abuse and correcting errors** in our operations when they occur.

False Claims Act

The **False Claims Act** is a federal law that makes it a crime to knowingly make a false record or submit a false claim to a federal health care program. Most states in which Trinity Health operates have also adopted similar state false claims laws.

Violations of false claims laws and other Medicare or Medicaid program requirements can result in **significant penalties** for organizations and individuals, including:

- Criminal penalties
- Civil monetary penalties
- Exclusion from participating in Federal or State health care programs.



Preventing False Claims

You can help prevent false claims. Depending on your role in Trinity Health, you can help by:



Maintaining complete and accurate medical records



Following all requirements of Medicare, Medicaid, and commercial health insurance programs



Submitting complete and accurate claims for services provided



Promptly investigating potential errors and take corrective actions to prevent future errors from occurring



Filing complete and accurate reports with payers and government agencies



Timely returning overpayments to Medicare, Medicaid and other health care programs



The submission of false claims is strictly prohibited in Trinity Health. Colleagues with any knowledge or concerns regarding potential false claims are expected to seek assistance from one or more of the resources described later in this program.

Case Study: False Claims...

The Situation

Tim, a patient, came to the hospital for chest pain

- Dr. Kotwokii told Jill to bill Tim's insurance, Medicare, for multiple tests, including an echocardiogram which he did not perform
- Jill was hesitant because she knew the test wasn't completed, but didn't want to go against the doctor's instructions, so she went along with it

What issues do you see with Dr. Kotwokii's and Jill's behavior?



Case Study: False Claims...

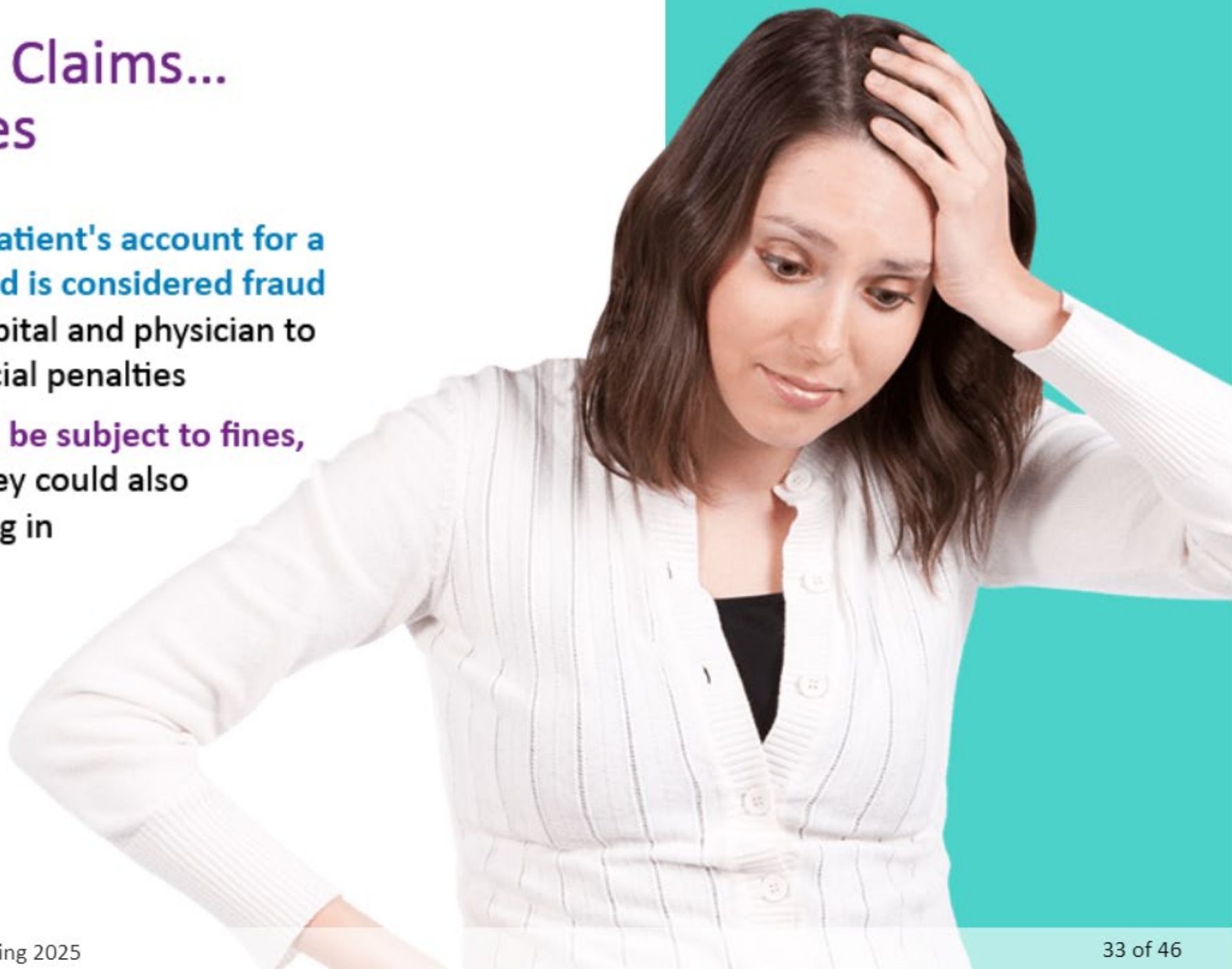
The Issues

- Dr. Kotwokii **told Jill to charge for a test that was not completed, knowing it would be a false claim**
- **Jill did not express her concern to Dr. Kotwokii because she feared retaliation**



Case Study: False Claims... The Consequences

- Intentionally charging a patient's account for a test that wasn't performed is considered fraud and could subject the hospital and physician to significant legal and financial penalties
- Dr. Kotwokii and Jill could be subject to fines, penalties, or even jail. They could also be prevented from working in the health care industry



A woman with dark hair, wearing a white cardigan over a black top, is smiling and holding a large white sign above her head with both hands. The sign has the text "If in doubt, ask for help!" written on it in a blue, italicized font. The background is a solid teal color.

*If in doubt,
ask for help!*

Case Study: False Claims... Lessons Learned

- Jill should have followed up with Dr. Kotwokii regarding the test and removed it from the account, which would have resulted in the correct claim amount to Medicare.
- **Don't be intimidated by another's status – always ask for help if you have an issue or concern.** Contact a higher-level manager, HR or Colleague and Labor Relations, your Integrity and Compliance Officer, the Trinity Health Integrity and Compliance Line or website.
- Seek help if you're not sure of the correct answer!

Financial Relationships

There are several federal and state laws that specifically apply to financial relationships between a health care provider and physicians and other persons or organizations that refer patients or residents to health care facilities for care and treatment.

Violations of these laws, even if unintended, can result in significant legal and financial penalties to the organization and individuals.



Trinity Health has established policies and procedures to ensure compliance with these laws.

If your role or responsibilities in Trinity Health include interactions with physicians or other referral sources, you should be familiar with Trinity Health's policies and procedures.

These policies are based on two key principles:



1. WE DO NOT PAY FOR REFERRALS. Referrals, admissions, and treatment decisions are based solely on an individual's medical needs and our ability to provide the needed services.



2. WE DO NOT ACCEPT PAYMENT FOR REFERRALS. No one in Trinity Health is permitted to solicit or accept anything of value in exchange for the referral of patients.

Contact your legal department or your Integrity and Compliance Officer if you have questions.

Consequences of Violations

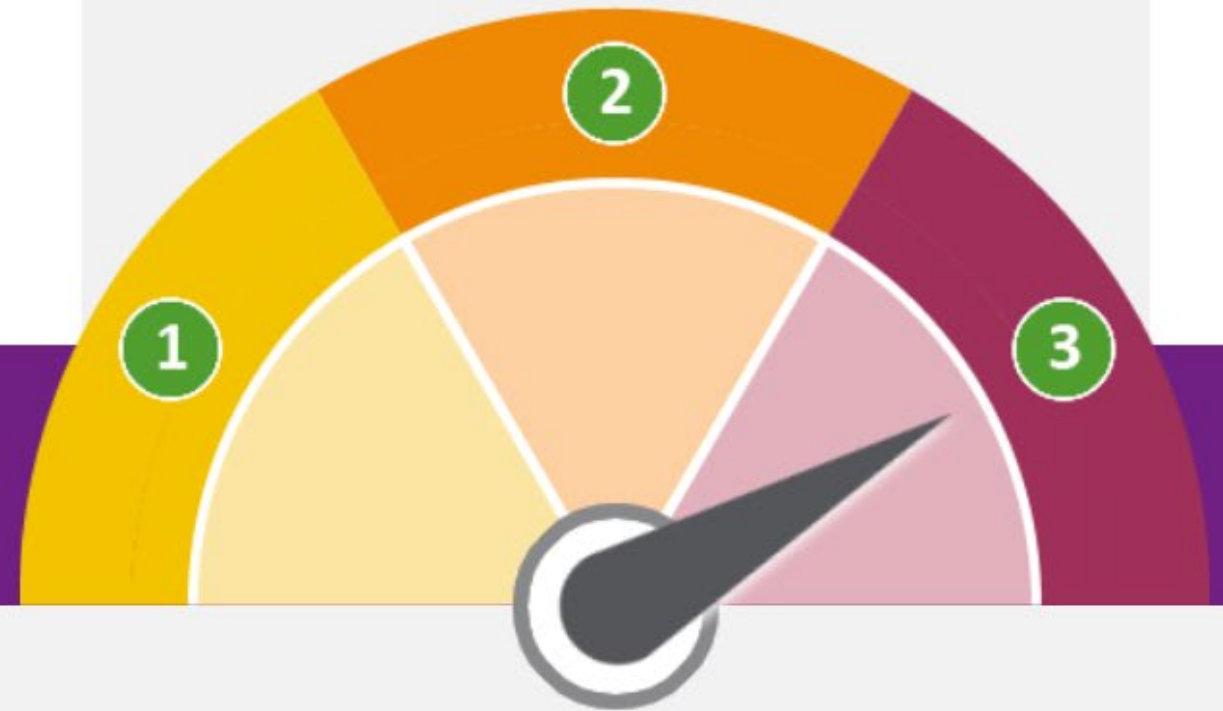
The standards set forth in the Code of Conduct are mandatory and must be followed. **All who work in Trinity Health are expected to carry out their work activities in a manner consistent with the Code of Conduct.**

Individuals will be held accountable for actions and behaviors inconsistent with the Code of Conduct.



Violations of the Code of Conduct will result in disciplinary actions, up to and including termination of employment.

1. Mandatory Training or Re-Training
2. Disciplinary Action
3. Termination of Employment



Patient Rights

Patients have the right to care in a clean, safe, smoke-free setting, regardless of their age, race, ethnicity, religion, culture, language, physical or mental disability, socioeconomic status, sex, sexual orientation, gender identity or expression or source of payment.

They also have a right to high-quality care, participation in their care, protection of privacy, help when leaving a hospital, and help with billing and insurance claims.





Cultural Sensitivity

Cultural sensitivity promotes health and healing by meeting the needs of the individual and must be incorporated when working with patients and residents to develop and implement their plan of care.

Being culturally sensitive includes:

- Learning what is important to an individual and respecting those preferences
- Being sensitive to their communication needs
- Promoting well-being by respecting the needs of all individuals
- Being sensitive to values, beliefs and practices while providing person-centered care

A Leader's Role

Leaders serve a key role in receiving and responding to questions and concerns raised by colleagues and others they lead.

How you respond to questions and concerns posed to you is critically important to ensuring that **those you lead have the trust and confidence to bring important matters to your attention.**



Leader Responsibilities

LEADERS in Trinity Health have a responsibility to:

SERVE AS A ROLE MODEL
for supporting our Mission and Core Values and in demonstrating high ethical standards

CLEARLY COMMUNICATE
your expectations for high standards of ethical behavior to those you lead

PROMOTE A CULTURE OF TRUST
with respect and open communication

ENSURE UNDERSTANDING
with those you lead and apply the guidance set forth in our Code of Conduct and hold them accountable

ENCOURAGE
those you lead to ask questions and raise issues and concerns

RESPOND TIMELY
and appropriately when matters are brought to your attention

ENSURE Trinity Health's non-retaliation policies are followed when individuals bring forward issues and concerns



Leaders serve a critical role in **upholding the long-established reputation** of Trinity Health in our communities and across the United States.

Resources

The Code of Conduct addresses common issues and questions you may encounter in your work in Trinity Health. However, there may be times when the answer to a particular issue or question is not clear, or times when you have a compliance or other concern that needs to be addressed. There are many resources available to assist you including:

- ➔ **YOUR IMMEDIATE SUPERVISOR**
is usually the best place to start in getting answers to your questions. Your supervisor understands the work you do and may already have the information you need or can direct you to the right resource
- ➔ **YOUR ORGANIZATION'S HUMAN RESOURCES STAFF**
can likely answer many of your questions and assist you in addressing workplace issues and concerns
- ➔ **CONTACT A HIGHER-LEVEL MANAGER**
if you are uncomfortable speaking with your immediate supervisor, or believe the concern has not been appropriately addressed
- ➔ **YOUR INTEGRITY AND COMPLIANCE OFFICER**
is responsible for operation of the Integrity and Compliance Program in your Ministry and is available to assist in getting answers to your questions and concerns

Integrity and Compliance Line

We encourage you to use one of the resources provided to address your questions and concerns. You are also welcome to **contact the Trinity Health Integrity and Compliance Line:**

- 866-477-4661; or
- www.mycompliancereport.com using THO as the access code; or
- use the Compliance Concern icon in ZENworks.



You may choose to remain anonymous, and all reports are confidential.



RETALIATION IS PROHIBITED



Trinity Health prohibits retaliation, in any form, against individuals who report issues and concerns in good faith.



Retaliation is subject to discipline, up to and including dismissal from employment.

Did we meet our objectives?



Additional Resources

- [Integrity & Compliance Line | Trinity Health \(sharepoint.com\)](#)
- [Patient Rights Checklist \(trinity-health.org\)](#)
 - Checklist from the Joint Commission
- [Trinity Health Code of Conduct | Trinity Health \(trinity-health.org\)](#)
- [Integrity and Compliance Officers | Trinity Health \(sharepoint.com\)](#)



You've reached the end of this activity.

Thank you for your time and attention!

Close this window to return to the course page.

Your next steps will be to complete the course assessment and then to give your feedback on this learning experience.

