

TUHS CORPORATE COMPLIANCE PROGRAM OVERVIEW

The TUHS commitment to Integrity as a Core Principle is embodied in the Corporate Compliance Program. This Program, which was originally adopted in 1996, reflects the ongoing commitment by the TUHS Board of Directors and Senior Management to the highest ethical standards in achieving our Mission. The Program is designed to develop and ensure effective internal controls that promote best practices and adherence to all applicable Federal and State legal or regulatory requirements. Through the adaptation of this voluntary Corporate Compliance Program, TUHS advances the prevention of fraud, abuse, and waste in the delivery of healthcare services. The Basic Pledge of the TUHS Corporate Compliance Program is to conform all operations to pertinent federal and state laws and regulations.

An important element of the Program is to establish an employee code of conduct to reinforce the TUHS commitment to the highest ethical standards. This is achieved through application of the TUHS Standards of Conduct contained in the Compliance Program. These Standards are applicable to all TUHS employees, and require that they follow the law and report any suspected potential violations. The successful operation of the Compliance Program depends upon the active involvement and participation of all TUHS employees. In the complex regulatory environment in which TUHS operates, each employee must take personal responsibility to ensure that every aspect of patient care and related business practices reflect our commitment to integrity. This commitment requires that every activity be approached in an ethical, humane, and professional manner to ensure that the right thing is done at all times.

Specific federal and state laws encourage anyone who has knowledge of an individual or organization engaging in fraudulent activities to report such activity to the government. The Federal False Claims Act allows a private individual, or “whistleblower” to bring fraudulent activities to the attention of the government, and possibly receive a share of any recovery the government may receive. The False Claims Act dates back to the Civil War, and was passed to ensure that anyone who deals with the Federal Government is held to a high ethical standard. Today, this law is used against any health care provider who bills Medicare incorrectly for medical services. Similar state laws protect the Medical Assistance (MA) Program against fraud and abuse. The TUHS Compliance Program is designed to ensure that we are doing everything possible to comply with the increasingly complex billing requirements for all TUHS medical services.

Active involvement with compliance also means that employees are required to report any potential or suspected problems to their supervisor, senior management or the TUHS Corporate Compliance Officer. Even when something just does not seem “right”, employees are encouraged to take responsibility and stand up for what is right and challenge what may be wrong. Reports may also be made through the TUHS Compliance Hotline at (800) 910-6721. The hotline permits anonymous reports at any time with all call activity reported directly to the Corporate Compliance Officer.

To encourage reports, it is the stated policy of TUHS that no retaliation will be taken against any employee for reporting problems. This policy extends to anyone who finds it necessary to report a perceived TUHS problem to any governmental agency. TUHS is committed to compliance with all governmental regulatory mandates, and cooperation with any inquiry regarding such mandates. In the end, the Compliance Program protects us all by ensuring that it is always the right time to do the right thing.

Questions or concerns about the TUHS Corporate Compliance Program may be addressed to the TUHS Corporate Compliance Officer at (215) 707-5605.