

# SIU School of Medicine SIU HealthCare POLICY

## FRAUD AND ABUSE COMPLIANCE AND REPORTING

### Policy

It is the policy of SIU to consistently and fully comply with all laws and regulations pertaining to delivery of and billing for services which apply to SIU on account of their participation in Medicare, Medicaid and other government programs. SIU collectively applies to the SIU School of Medicine (SIU SOM), (including the Federally Qualified Health Center (FQHC)), and the SIU HealthCare (SIUHC).

### **I. Background**

SIU has developed a fraud and abuse compliance program that is a comprehensive statement of the responsibilities and obligations of all employees of SIU and regarding submissions for reimbursement to Medicare, Medicaid, and other government payers. In addition, this policy is intended to apply to business arrangements with physicians, vendors, hospitals and other persons which may be impacted by federal or state laws relating to fraud and abuse.

### **II. Policy**

#### **A. Compliance Standards/Manuals**

Compliance standards and manuals specific to affected areas of SIU SOM and SIU HC shall be developed and kept current with applicable laws and regulations.

The compliance standards for each clinical department and other SOM departments that manage delivery of and/or billing services shall contain a statement of compliance and shall define and assign responsibility for the timely and comprehensive updating of both the compliance standards and the compliance manual, necessary training and education, record keeping, and the completion of audits as designated by the Compliance Officer<sup>1</sup>.

The compliance manual shall be a resource for the employees of each department designed to enhance the ability of employees to perform their responsibilities in compliance with the SIU SOM compliance policy and applicable laws and regulations. The CEO of SIU HC and the Department Chair, the Clinical Administrator, and/or the Manager in each affected department is responsible for ensuring that the compliance standards and manuals as required by this program and as designated by the Compliance Officer are developed and maintained in accordance with this policy.

It is the responsibility of every employee in the organization to abide by applicable laws and regulations and support SIU SOM's and SIU HC's compliance efforts.

#### **B. Confidential Disclosure System**

All employees are required to report their good faith belief of any violation of the compliance program or applicable law. The Compliance Officer or designee at the request of the employee(s), will provide such anonymity as practical to the employee(s) who report. Under certain circumstances, however, in the judgment of the Compliance Officer it may be

<sup>1</sup>Compliance Officer also refers to the Compliance Officer's designee

necessary for disclosure consistent with the Compliance Officer's obligations to investigate employee concerns and take necessary corrective action. SIU SOM and SIU HC shall not retaliate against an employee as a result of such reporting. Compliance questions or matters can be reported using any of the following:

**a. Oral Reports**

Employees may report their good faith belief or violations of the compliance program or applicable laws orally by calling a dedicated hotline telephone number established for this purpose.

- Call the help and reporting hotline number (217) 545-7479 (forwards to Chief Compliance Officer's voicemail after hours).
- The Office of Compliance & Ethics will answer the phone or you will be connected to an automated voicemail messaging system. Callers will be interviewed regarding the incident or situation that prompted the call.
- Leave your name, contact information, and applicable message with as many details regarding the matter as you can provide. You may at your option make the call anonymously. Callers will have confidence that the information provided will not be used against them. The caller will not be required to identify himself or herself, and reports will contain no gender-specific or other identifying information regarding the caller.
- Only the Office of Compliance & Ethics will receive these messages through password protected access to the voicemail messaging system.
- Calls are treated confidentially.

**b. Written Reports**

Employees may report suspected improper conduct, illegal actions, good faith belief of violations of the compliance program or applicable laws by completing the Compliance Incident Report Form or through a secure email system noted below.

- Compliance Incident Report available for download in PDF format: [Compliance Incident Report Form](#)
- SIU e-mail: [Compliance\\_Hotline\\_Reporting@siumed.edu](mailto:Compliance_Hotline_Reporting@siumed.edu)
- SIU Ethics email: [ethics@siumed.edu](mailto:ethics@siumed.edu)
- Send information by mail to:  
Office of Compliance & Ethics  
201 E. Madison Street – Room 342  
PO Box 19683  
Springfield, IL 62794-9683
- Written complaints or reports to the Compliance email or Compliance Incident report will be handled in the same confidential manner as oral reports.

**c. Other Access**

Other means of access to the Office of Compliance & Ethics are available that may or may not protect the identity of the person making the report. These means may be used at the discretion of the reporting party and include the following:

- Walk-in or scheduled appointment.
- Written complaints or reports marked "Confidential" may be delivered to:

Office of Compliance & Ethics (either by delivery, campus mail or postal service).  
 201 E. Madison Street – Room 342  
 PO Box 19683  
 Springfield, IL 62794-9683

- Phone or electronic mail.

**C. RESPONSIBLE OFFICER**

SIU SOM has designated the Compliance Officer as the individual responsible for providing the overall direction and supervision of the compliance program. The implementation of the compliance program will be the responsibility of the Dean and Provost of the SOM/CEO of SIU HC who reports issues of noncompliance to the Compliance Officer. The Dean and CEO of SIU HC in coordination with the Compliance Officer shall be responsible to ensure that:

- Standards and manuals are reviewed and updated as necessary;
- Employee and vendor screening mechanisms are in place and are operating properly;
- Employees are receiving adequate education and training and that such education and training is documented;
- Audit procedures are implemented in accordance with the SIU SOM audit policies;
- Employee complaints and other concerns regarding compliance are promptly investigated; and
- Adequate steps are taken to correct any identified problems and prevent the reoccurrence of such problems.

**D. REPORT TO THE BOARD**

The Compliance Officer shall report in writing annually to the Board of Trustees of Southern Illinois University, the Board of Directors of SIU HC, and the Dean and Provost of SOM on the status of compliance within SIU SOM and SIU HC.

<b>Adopted: January 20, 1999</b>	<b>Contact: Compliance Officer</b>
<u><b>Revision:</b></u> Approved by OCP: 1/11/2017 Approved by Quality and Safety: 2/21/2017	<u><b>References:</b></u> <ul style="list-style-type: none"> <li>• Department of Health and Human Services, Office of Inspector General OIG Compliance Program for Individual and Small Group Physician Practices (65 CFR 194)</li> <li>• Patient Protection and Affordable Care Act of 2010 , Section 6401 of the Affordable Care Act provides that a “provider of medical or other items or services or supplier within a particular industry sector or category” shall establish a compliance program as a Condition of enrollment in Medicare, Medicaid, or the Children’s Health Insurance Program (CHIP)</li> </ul>

<sup>1</sup>Compliance Officer also refers to the Compliance Officer’s designee