

Schofield Corporate Compliance Program Summary

Below is a summary* of the Schofield Corporate Compliance Program, which is the method used by the organization to:

- Comply with all laws, regulations and ethical standards applicable to the organization's operations.
- Make known the organization's strong commitment to providing the care and services necessary to attain the individuals we serve highest practicable physical, mental and psychosocial well-being.
- Formalize the organization's compliance efforts and clearly define the expectations and responsibilities of its employees and contractors.
- Describe the methods used to monitor, prevent and detect fraud, waste and abuse.

*A copy of the entire Compliance Program is readily available to you by contacting the Compliance Officer – Susan Rozumalski at 874-1566, extension 322.

A) Standards of Conduct

While it is not feasible to cover all potential legal, regulatory and ethical compliance issues, the Standards of Conduct are intended to guide the performance of staff, volunteers and vendors/contractors.

- 1) Quality of Care – Measures to deliver quality, necessary health services including: accurate assessment, appropriate and sufficient treatment, adequate staffing, appropriate therapy services, a clean and safe environment free from abuse, mistreatment and neglect.
- 2) Rights – Measures to promote dignity, self-determination and reasonable accommodation of individual needs.
- 3) Kickbacks, Self-Referral and Inducement – Measures and prohibitions to prevent conflicts of interest, or the appearance or impropriety including:
 - Prohibition or solicitation or acceptance of gifts.
 - Prohibition on inducements in exchange for referrals.
 - Prohibition on referral based financial arrangements.
- 4) Billing and Cost Reporting- Schofield will only submit complete and accurate bills for necessary services provided. Prohibitions include:
 - Duplicate billing
 - Upcoding the level of service provided
 - Failing to report overpayments

- 5) Recordkeeping and Documentation- Practices describing creation, distribution, retention, storage, retrieval and destruction of documents. Prohibits falsification of records and stresses the need to take measures to maintain integrity and confidentiality of health information.
 - 6) Employee/Contractor Screening- Describes measures to ensure integrity of workforce and contractors including registry check, criminal history record checks, and OIG/OMIG exclusion lists.
 - 7) Compliance as an Element of Performance – Describes the expectation that employees, vendors and contractors will abide by all applicable laws, rules, regulations and the standards of conduct. Suspected violations must be reported.
- B) The Corporate Compliance Committee and their responsibilities.
 - C) The Corporate Compliance Officer: Susan Rozumalski, who can be reached at 874-1566, extension 322.
 - D) Communications – channels to allow for open communications of actual or potential violations of the Standards of Conduct by reporting to management, the Compliance Officer, the Corporate Compliance email (complianceofficer@schofieldcare.org) or the **anonymous corporate compliance hotline at 874-1566, extension 371.**
 - E) Confidentiality and Non-Retaliation Policy
 - F) Enforcement of Standards
 - G) Monitors and Audits – Measures of the effectiveness of the compliance program through internal review, audit, evaluations, resolution of deficiencies, performance improvement and quality assurance initiatives.
 - H) Response to Detected Offenses- Investigation and response to alleged misconduct.