COMPLIANCE NEWSLETTER

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Your Role in Compliance

Kathy Litel, Compliance Officer High Desert Medical Group

⁶⁶ It is always the right time, to do the right thing. ⁹⁹ Martin Luther King

Most people want to do what is right, but what does that look like in your workday?

First, we must <u>comply</u> with all laws and standards that apply to the work we do. This includes adopting and following a Compliance Plan, and Policies and Procedures. These documents will help explain relevant laws and regulations, and can be found on your Group's website.

Second, you have a duty to report any compliance concerns, and suspected or actual violations of which you may be aware. You can report in good faith and without fear of retaliation to your supervisor and/or Compliance Officer (see below for reporting methods).

Third, and very important, you have a duty to conduct yourself in a manner that lines up with the Standards of Conduct which states a commitment to integrity and ethical rules of behavior. It all starts from within; and when you understand and care about ethics and standards, the rest falls into place.

If you have any questions, you can reach out to your supervisor, Human Resources, or Compliance Officer.

What Should I Do?

You are expected to comply with all laws, regulations, and company policies. What does that look like in practice? When in doubt—report it! Here are some example scenarios:

- While working on a member's case, I noticed that treatment was provided more often than what is customary. What should I do?
- 🚺 🛂 I work in the claims department and I noticed some discrepancies and inconsistencies in a provider's billing. What should I do?
- My co-worker reviewed one of our mutual friend's medical record out of curiosity. What should I do?
- A Q1 and Q2 scenarios could be potential fraud or abuse related concerns; while Q3 may be related to HIPAA privacy. In each of these scenarios, you must report your concerns to your supervisor, Human Resources, and/or Compliance Officer. Include any information that you have available to assist in the investigation. Any investigation conducted will determine whether or not a violation has occurred. Remember—you are protected from retaliation and intimidation any time you make a report in good faith.

FRAUD, WASTE, ABUSE & NON-COMPLIANCE

- Reports are kept confidential to the extent possible and may be made anonymously.
- · Report without fear of reprisal or any other penalty, including retaliation or intimidation.
- Reports may be made 24/7, to your Compliance Officer through the Compliance Confidential Hotline, by email, or by mail.

Refer to CMP-GN-006 Whistleblower Protection policy.

Corporate Compliance Officer: Ralph Oyaga | royaga@heritagemed.com Hotline: 855-625-7894 | 44469 10th St W, Lancaster, CA

Heritage Provider Network's Group Compliance Officers

ADOC/LMG/RMG Jeff Baron BFMC/CCPN Melissa Winters DOHC/AZPC Ryan Galli HDMG Kathy Litel **Sherry Connelly HSMG** HVVMG Denise Rock

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