



# University of Connecticut Health Center

**POLICY NUMBER 2003-35**

**April 14, 2003**

**POLICY: COMPLIANCE EXPECTATIONS AND GOALS**

**UCHC seeks to fulfill each of the expectations that follow.**

**Honesty:** We are truthful. We don't intentionally mislead or provide inaccurate information in our work. We follow our Code of Ethics.

**Recognizing and Avoiding Conflicts of Interest:** In our work, our outside personal or financial interests do not sway our judgment. If we know a conflict with a personal interest exists, we appropriately disclose it. We don't inappropriately use our work position as leverage to gain personally.

**Documentation:** No matter what our work, we document legibly, accurately and in a timely manner, so that written and electronic documents reflect truth and accuracy.

**Gifts:** We don't ask for or accept gifts that may be perceived as exchange for our services. We follow the State of CT Code of Ethics Policy and the UCHC Compliance Office Policy on acceptance of gifts to guide our actions.

**Confidentiality:** We protect patient confidentiality and UCHC business/financial information. We don't attempt to access/use/disclose any information we would not normally have in our work. We follow UCHC's confidentiality policy.

**Employment Responsibilities:** UCHC values all members of its workforce and recognizes that each individual person contributes to the overall success of the institution. The opinions of the workforce at UCHC are valued. All individuals are encouraged to share concerns and questions and supervisors are expected to listen and respond as promptly as possible. Supervisors are unbiased and fair in all aspects of their management of employees. Residents, all types of students and volunteers are treated objectively and fairly. Relationships of a personal or family nature between supervisors and those they supervise are prohibited. UCHC ensures that mandated training and skill development occurs as required. Individuals are also encouraged to take advantage of development programs offered both here at UCHC and in formal training programs and institutions.

**Harassment/Discrimination/Equal Opportunity Employment/Respect for Diverse Cultures and Religions:** UCHC values its diverse workforce, seeking to maintain it and respecting diversity in all persons we come into contact with. We remain free from discrimination and harassment of all kinds.

**Credentialing/Verification of Employee Qualifications:** UCHC employs only individuals with the proper qualifications, license, or credentials for the given job. Professional staff only practice within the privileges approved for them by the Medical Staff Services Office and/or the scope of their license.

**Safety:** We promptly report all safety concerns, adverse patient reactions and events and comply with all regulations governing all aspects of safety training and reporting. We handle all hazardous materials according to regulations. We maintain a drug and smoke free work environment. We care for patients safely and follow the Emergency Medical Treatment and Active Labor Act by providing emergency care to all patients who seek it without regard for ability to pay.

**Actual patient services provided that are also medically appropriate:** We only bill for medically appropriate services that were actually performed by properly licensed professionals. Clinical staff communicates clearly with billing staff about what services are billed.

**Patient Rights:** The Patient Bill of Rights is given to each patient admitted to John Dempsey Hospital and is available to all patients treated at UCHC. We respect the patient right to seek treatment at an alternative facility if they so choose. Our Patient Relations Department assures patient rights are a priority.

**Billing and Coding Compliance:** We don't submit duplicate bills or separately bill outpatient services we provided within the applicable DRG window for inpatient admissions. We follow unbundling rules. We properly bill transfers from our hospital to other institutions. We follow government teaching physician rules by assuring physician presence during required portions of patient care when residents are involved in that care. We do not 'upcode': engage in coding techniques that result in payment that is higher than actual services provided would normally collect.

**Responsible Conduct of Research:** Research is conducted in accordance with the requirements of a complex ethical and regulatory framework. As such it is conducted in accordance with, but not limited to, the precepts of the codes of ethics of professional societies, and regulations governing:

- the use of human subjects in research
- the use of animal subjects in research
- the use of radioactive substances
- laboratory safety
- select biological agents
- fiscal compliance

**Financial Reporting:** John Dempsey Hospital submits cost reports completed in compliance with all legal requirements. Whenever billing errors or overpayment are found, corrective action is taken immediately and refunds are processed.

**Marketing and Fundraising:** Any such efforts are done with honesty and responsibility to our patients and the public.

**Kickbacks/Referrals/Inducements:** UCHC does not engage in offering or receiving kickbacks or an inducement that may influence our decisions on buying or other's use of our services. No one at UCHC makes or authorizes illegal payment or bribes.

- ✓ Approval is always required by the UCHC Assistant Attorney General's Office before entering into arrangements regarding referrals.
- ✓ All vendor contracts, personal services agreements for clinical and support services and other contracts are approved by either the Purchasing Department or the Office of Clinical Planning, Managed Care and Decision Support.
- ✓ Individuals do not approve of any discounts, free goods, rebates or allowances without the prior approval of the Purchasing Department.

Robert Kozol, MD (signed)

3/20/03

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**UCHC Chief Compliance Officer**

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**Date**

Peter Deckers, MD (signed)

3/20/03

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**Executive Vice President for Health Affairs**

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**Date**

**REPLACES: NEW POLICY**

**2/24/03**