



University of Connecticut
Health Center

What are the consequences of non-compliance?

With regard to federal regulations, individual employees or practitioners may be subject to civil and criminal penalties or exclusion from the Medicare/Medicaid Programs. The organization may be subject to fines and exclusion from the Medicare/Medicaid Programs. The organization may take disciplinary action against non-compliant individuals up to and including termination.

What do I do if I have a compliance related concern?

Employees have a duty to report compliance concerns. Sometimes individuals are uncertain if a certain policy, procedure or established business practice is appropriate to follow. If you are unsure, seek clarification from your supervisor or the UCHC Compliance Officer. If you are not comfortable using the internal resources available, you may call in your concern confidentially to the **Reportline** which operates under the UCHC Reporting and Non-retaliation Policy.

Resources for your Compliance Concerns:

- Your Supervisor
 - Chief Compliance Officer
Iris Mauriello RN
860 – 679 – 3501
 - Reportline 1 - 888 – 685 – 2637
 - The UCHC Compliance Program manual is available in the Compliance Office shared folder in UCHC email.
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Ethos
Truthfulness
Honesty
Integrity
Compliance
UCHC
Standards

**Employees Guide to the
University of Connecticut Health Center
Compliance Program**

What is the purpose of the UCHC Compliance Program?

The program assures that there is a structured approach for the UCHC to remain in full compliance with all relevant laws, standards, and federal reimbursement guidelines.

What type of laws, standards, and regulations apply to the healthcare industry?

Examples include, but are not limited to, Federal False Claims Act, regulations governing participation in the Medicare/Medicaid Programs, Stark Bill, Medicare/Medicaid anti-kickback laws, Emergency Medical Treatment and Active Labor Act, Health Insurance Portability and Accountability Act, federal regulations governing protection from research risks, state licensure laws for hospitals, JCAHO standards, lab accreditation standards and various environmental and safety laws.

Who is responsible for the UCHC Compliance Program?

Everyone in the organization is responsible for compliance. You are obligated to:

- Comply with laws, standards, and regulations.
- Comply with policies, including the Code of Ethics which promotes honesty and integrity.
- Document accurately in the medical record and all other reports.
- Avoid conflicts of interest.
- Adhere to proper business and marketing practices.
- Ensure a safe workplace.
- Maintain a drug and alcohol free workplace.

How is the Compliance Program carried out?

Education is provided on an annual basis to ensure that all employees understand the program and how to access it.

Monitoring activities are also carried out to ensure that key processes are conducted appropriately.

Examples of Compliance:

- MDs must order and bill for services that are medically necessary.
- Coders must ensure diagnosis or procedure coded is supported by appropriate documentation.
- A nurse must document a patient's choice in discharge planning options.
- Medical assistants enter only charges documented in the patient's record.
- All staff understand patient privacy and confidentiality policies.