

Compliance Program

Compliance Today

Compliance Week



Corporate Compliance and Ethics week is an annual event sponsored by the Health Care Compliance Association (HCCA) and the Society of Corporate Compliance and Ethics (SCCE) as a means to assist in educating workforce members on the importance of compliance and ethics. The first 'official' Corporate Compliance and Ethics Week was observed in 2005; however, its roots can be traced back as early as 2002, when two HCCA members, Gene DeLaddy and Cheryl Atkinson, wrote an article for *Compliance Today* telling others about an awareness program at their facility. Gene and Cheryl's event was called Compliance Awareness Week and was celebrated at the Carolinas HealthCare System in Charlotte, NC.

This year marks the 14th annual Corporate Compliance and Ethics Week celebration. Historically, Corporate Compliance and Ethics Week was observed the first week in May. In 2015, HCCA and SCCE moved the celebration to the first full week in November to better align with the implementation of the Federal Sentencing Guidelines; November, 2004.

Community Health Plan of Washington (CHPW) has celebrated Corporate Compliance and Ethics Week since 2012. The Compliance department leads activities and educational opportunities throughout the week to interact, educate, and engage with workforce members.

The theme for 2018 is, "**Awareness, Recognition, Reinforcement.**"

Join the Compliance department in celebrating:

- Educational Games:
 - Photo Search
 - Golden Ticket
 - Word Scramble
 - Recognizing Compliance
- Department Open House
 - **Tuesday, November 6, 10:00 a.m. to 11:00 a.m.**
 - Refreshments and treats
 - Trivia Wheel
 - Recognizing Compliance Ball Drop
 - Phishing Pond
 - Learn how to properly secure your laptop
- Daily quizzes through InsideCHPW (based on content from this newsletter and other compliance-related information).
- Win Prizes!
 - The more you play and interact, the more chances you have to win.

For more information, visit:

- [Corporate Compliance and Ethics Week](#)
- [HCCA, SCCE](#)
- [Compliance Department on InsideCHPW](#)

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A Message from Leanne on CHPW's Standards of Conduct

CHPW is committed to conducting business with the highest degree of ethics, integrity, and compliance with laws. Our **Standards of Conduct** set forth these commitments and provide standards for our conduct across our CHPW workforce, governing body, and our contracted first tier, downstream, and related entities (FDRs).

CHPW's Standards of Conduct are an extension of our Mission and organizational values. **CHPW's Standards of Conduct** go beyond complying with laws; the standards reflect our expectations that CHPW's staff, governing body, and contracted partners (FDRs) will conduct all business with honesty, dignity, and respect for our members, and that all activities are conducted with the utmost degree of integrity. **CHPW's Standards of Conduct** are designed to help guide us in our decision-making and activities on behalf of CHPW to ensure that we continue to meet our high ethical standards. It is important that each of us understand and follow **CHPW's Standards of Conduct**, comply with all applicable laws, and refrain from business situations that would place CHPW at risk or jeopardize CHPW's integrity and reputation in the community.

Every CHPW workforce member is encouraged to report any known or suspected illegal or unethical behavior, or violations of the **Standards of Conduct**. You may report concerns by any means available, up to and including: calling the Compliance Hotline, at **(800) 826-6762**; contacting the Compliance Officer at x5091 or compliance.officer@chpw.org; the Vice President of People and Culture; the Vice President, General Counsel, or; any CHPW management personnel. The Compliance Hotline is managed by NAVEX and any reports made are kept confidential. The Compliance

Hotline is available 24 hours a day, 7 days a week. CHPW has a zero-tolerance policy against retaliation, or threats of retaliation, against individuals or entities making good-faith reports. Reports may be made anonymously.

All reports of suspected violations will be thoroughly investigated in as discrete and confidential a manner as possible. Reports of suspected violations are sent to CHPW's Compliance Officer and the Vice President, General Counsel. The CHPW/CHNW Board Ethics Committee is also informed of any reports and outcomes of investigations.

Maintaining ethical conduct and complying with laws are foundational to CHPW's Mission and success. We count on each and every employee to do their part by understanding and adhering to the **Standards of Conduct** and reporting any potential concerns.

For more information, visit:

- [CHPW's Standards of Conduct](#)

Cybersecurity: Protecting PHI in Email

While email is an effective communication tool, it also exposes CHPW to increased risk of data breach. Extra diligence is required when communicating protected health information (PHI) or personally identifiable information (PII) electronically. Contractual and regulatory requirements mandate CHPW to protect private data, like PHI/PII, through technologies such as encryption.

Common examples of PHI/PII include (but are not limited to):

- Name
- Social Security Number
- Telephone/Fax Number(s)

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- Health Insurance Claim Number
- Date of Birth
- Email address
- National Provider Identification Number
- Driver's License
- Passport Number
- Biometric Information
- Medical Record Number
- Medical ID Number
- Certificate/License Numbers
- Account Numbers

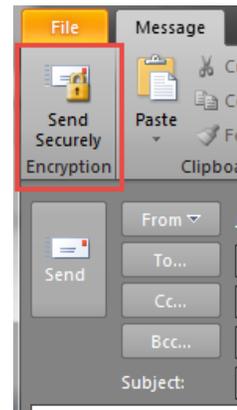
Any time you email PHI/PII to someone outside CHPW you must either encrypt the attachment (sending the password in a separate email), or encrypt the email. If you are encrypting the email itself, CHPW uses **Proofpoint Encryption** to protect and distribute sensitive and confidential information.

Sending PHI/PII electronically without either securing the email or attachment violates CHPW's Security policies and procedures (P&Ps). Continued failure to comply with Security P&Ps will result in disciplinary action.

Encrypting with Proofpoint

Email is automatically encrypted and protected within CHPW; however, when emailing externally (outside CHPW) you must follow these simple steps to encrypt the information:

1. Write your email message and include relevant attachments (if any).
2. Click the "Send Securely" button.



- a. Alternatively, you can type "[encrypt]" (including the brackets, not quotes) anywhere in the subject line of your email message.
- To retrieve encrypted messages, the receiver must create or have an existing account through Proofpoint.

There are filters in Proofpoint to scan outbound messages for PHI/PII. If you forget to "Send Securely," Proofpoint should stop the email message and send you a notice that the email was not released from CHPW's network. Retrieve your message from "Sent Items" and resend using the "Send Securely" button.

If you need to email a large file containing PHI/PII outside of CHPW, submit a ticket to the IS&T Help Desk for assistance in using secure FTP transfer or another secure option.

For more information, visit:

- [Information Privacy Workforce Member Responsibility](#) procedure (CO317)
- [HIPAA Security policy](#) (CO330)
- [Encrypting PHI Tips](#)

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Exclusion Screening

CHPW shall not use federal or state funds to pay for services, equipment, or drugs prescribed or provided by a provider, supplier, employee, or first tier, downstream, and related entity (FDR) excluded by the Department of Health and Human Services (DHHS) Office of the Inspector General (OIG) or General Services Administration (GSA).

CHPW is prohibited by law from contracting or doing business with any person or entity that is currently debarred, suspended, excluded, proposed for debarment, or declared ineligible to perform work under any government contract or subcontract.

CHPW and the FDR it contracts with, must review the OIG List of Excluded Individuals and Entities (LEIE) and the GSA Excluded Parties List System (EPLS) located in the Systems for Award Management (SAM) prior to hiring or contracting of any employee, temporary employee, volunteer, consultant, governing body member, or FDR, and monthly thereafter to ensure none of these persons or entities are excluded or become excluded from participation in federal or state programs.

The OIG's LEIE includes all health care providers and suppliers that are excluded from participation in federal or state health care programs, including those health care providers and suppliers that might also be on the EPLS. In addition to health care providers (that are also included on the OIG LEIE) the EPLS includes non-health care contractors.

For more information, visit:

- OIG LEIE – <https://oig.hhs.gov/>
- GSA SAM and EPLS – <https://www.sam.gov/>
- [Exclusion Screening](#) policy (CO318)

- [Exclusion Screening](#) procedure (CO337)

Getting to Know Compliance: Lisa Dupleich



Lisa joined CHPW in September and currently serves as Compliance Specialist I. Lisa brings with her three years of experience in fraud investigations with a focus on Quality Assurance. She holds a Bachelor's degree in Business Finance, with a minor in Hispanic Studies.

Lisa is passionate about healthcare because she enjoys ensuring our community has access to adequate care in order to maintain overall wellness. Her favorite thing about working at CHPW, "is helping members see providers with outstanding performance accountability and long-term effectiveness."

Outside of work, Lisa loves to travel (mainly in Latin

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America) and enjoys cooking and trying out new vegetarian recipes. She is an animal lover and has rescued a few lost dogs herself. She is currently looking for a rescue team to join as a volunteer. One thing you may not know about Lisa is that she enjoys going out salsa/bachata dancing with friends and taking dance classes.

Lisa and the Compliance department are located on the 9th floor. Be sure to stop by and say hi!

Compliance Hotline (800) 826-6762

CHPW provides access to a confidential, anonymous **Compliance Hotline** for workforce members to report instances of suspected or detected non-compliance, potential FWA, and other compliance and ethics concerns. The Hotline is operated and available 24 hours a day, seven days a week at **(800) 826-6762**, by NAVEX (vendor).

In order to ensure confidentiality and comfort in reporting, the Hotline vendor **does not** trace or record calls. If you choose to remain anonymous, no one will attempt to identify you. If you choose to identify yourself, CHPW will keep your identity confidential, to the fullest extent possible or allowed by law.

When you make a report, the Compliance Hotline Representative (at NAVEX) documents your concern(s) and comment(s). The Hotline vendor then forwards the report to both the CHPW VP of HR and the Compliance Officer for investigation and resolution. You can request an update on the progress or outcome of the investigation by contacting the Compliance Hotline and using the unique identification number and PIN provided during your initial report.

Updates and Reminders

Congratulations, Marie Zerda!



Join the Compliance team in congratulating Marie on obtaining her Certified in Healthcare Compliance (CHC) designation. The Compliance Certification Board (CCB) announced Marie Zerda successfully completed the CHC examination earning the CHC designation. Founded by the Health Care Compliance Association (HCCA) in 1998, the Compliance Certification Board (CCB) exists to develop criteria for the determination of competence in the practice of healthcare compliance at a variety of levels and to recognize individuals meeting these criteria.

As the Compliance Officer, Marie is tasked with ensuring CHPWs Compliance Program follows federal, state and local regulations that govern the delivery of

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healthcare.

Marie has served as CHPWs Compliance, Privacy and Security Officer since 2012. Marie brings with her more than 30 years of experience managing operational business units such as: Claims, Customer Service, Appeals, Grievances, Coding, Provider Operations and Benefit coding. In addition to her experience in the private sector, Marie also worked as a Region X Account Manager for the Centers for Medicare & Medicaid Services.

Marie and the Compliance team are located on the 9th floor. Be sure to stop by and congratulate her.

Compliance on Inside CHPW

The Compliance department would like to announce the launch of its InsideCHPW page. Here, you will find information about the department, who's who and individual areas of responsibilities, compliance-related tips and information, forms, *Compliance Today* newsletter, and more. The new page will become the vehicle for ongoing, regular news and updates.

If you have any questions, email the Compliance department at compliance.training@chpw.org.

Annual Compliance Program Training

CHPW's annual Compliance Program Training was assigned to workforce members on August 20, 2018. If you were hired before 2018 and have not been assigned this training, contact HR.

Workforce members have until the **end of day, Friday, November 23, 2018** to complete training.

If you have any questions related to the Compliance

Program Training requirements or modules, contact the Compliance department at compliance.training@chpw.org.

Note: for best results, complete training using the Chrome browser, not Internet Explorer.

Recently Updated Compliance Policies and Procedures

- [Exclusion Screening](#) policy (CO318)
- [Compliance Hotline](#) policy (CO319)
- [Compliance Hotline](#) procedure (CO320)
- [Cooperation with Auditors & Investigators](#) procedure (CO328)
- [Verification of Services \(VOS\)](#) policy and procedure (CO356)
- [Filing Forms B, C, and D with the OIC](#) policy (CO362)