Compliance Training 2020



Overview of the NMH Compliance Program

The North Memorial Health (NMH) Compliance Program is an organization wide set of activities that:



Overview of the NMH Compliance Program

The Compliance Program helps NMH identify compliance concerns and reduce compliance risks.

Compliance Department Staff work with team members to implement changes to correct identified non-compliance and prevent the problem from happening again.

Compliance Program Activities

The compliance program includes:

- · Code of Conduct
- · Written policies and procedures
- Training and education for team members
- Monitoring and auditing activities that identify areas of non-compliance
- · Investigation of reported concerns
- Corrective action plans to correct noncompliance



Reporting Compliance Concerns



- All NMH Team Members are expected to report any known or potential concerns of non-compliance.
- Team members are able to report concerns in several different ways.
- All reported compliance concerns are investigated by the Compliance Department. Investigations are handled confidentially.

How to Report a Compliance Concern

- You can speak to your supervisor, and your supervisor will report the concern to Compliance.
- Email (compliance@northmemorial.com).
- Call the Compliance Hotline.
 - This number is printed on the back of your employee badge!
 - You may leave an anonymous message on the Hotline.



NMH Prohibits Retaliation



NMH prohibits anyone from retaliating against a team member who asks compliance-related questions or makes a compliance report in good faith.

However, if you do not feel comfortable identifying yourself, you may leave an anonymous message on the Compliance Hotline.

Please be aware that anonymous reports do not allow Compliance Staff to gather more details from you to assist with completing a thorough investigation, so you are encouraged to leave contact information when making a report.

Code of Conduct

The NMH Code of Conduct is available on the Compliance Department intranet webpage.

The Code of Conduct is a set of principles that ensure NMH business is conducted in a safe, respectful, and ethical way.

All team members must follow the Code of Conduct when conducting their job duties.



Conflicts of Interest

- A conflict of interest exists when your own personal interests influence or appear to influence your actions while performing NMH duties.
- NMH has a conflict of interest policy that all staff must follow. Any potential conflicts of interest must be reported.
- The next slide explains NMH policies that prevent conflicts of interest.



Conflicts of Interest

Team members must maintain professional relationships with customers. Business relationships may also create conflicts of interests.

Click on the buttons below for tips to avoid conflicts of interests involving customers and violation of NMH policies.

Team Members

Business Relationships

Conflicts of Interest



Business relationships may create conflicts of interests. To avoid conflicts of interests and violation of NMH policies, remember:



- NMH prohibits team members from accepting gifts or reimbursement from vendors. Please see the Gift policy for more information.
- NMH prohibits team members from conducting personal business when at work, as well as using NMH equipment or property for conducting personal business.
- Medical staff are prohibited from engaging in inappropriate self-referral arrangements.
- No NMH team member may offer gifts or payments of any kind to a physician who refers customers to NMH.

Conflicts of Interest



Team members must maintain professional relationships with customers. To avoid conflicts of interest involving customers, remember:



- NMH prohibits team members from accepting cash or gifts from customers. Please see the Gift policy for more information.
- Team members must not serve as a personal representative for a customer or be named in a customer's will.
- Clinical team members may not provide care to his/her own family members.

Policies and Procedures

- All NMH Policies and Procedures are maintained in the Document Management system.
- All Team Members have access to the Document Management System. It can be accessed through the NMH Portal.
- All new and revised Policies and Procedures must be approved according to NMH policy management process. You can learn more about this process on the NMH Intranet Policies and Procedures webpage.



Expectations of Compliance

- Compliance is an expectation of your employment.
- Compliance violations are subject to disciplinary action, up to and including termination.
- All disciplinary actions taken for noncompliance are consistent with NMH Human Resources policies.



When in doubt, ask questions and report concerns!



Compliance Contacts

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