

The Compliance Standard

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Children's®
Healthcare of Atlanta

Seven elements of an effective compliance program

Children's has adopted the following elements of an effective compliance program as outlined in the U.S. Sentencing Guidelines:

1. Standards and procedures—The development and distribution of written standards of conduct, as well as written policies and procedures
2. Oversight—The designation of a chief compliance officer
3. Education and training—The development and implementation of an effective educational and training program
4. Auditing and monitoring—The use of audits and other evaluative techniques to monitor compliance and assist in the reduction of identified problem areas
5. Reporting—The maintenance of a hotline to protect anonymity and whistleblowers from retaliation
6. Enforcement and discipline—The development of a system to respond to allegations and improper activities, and enforcement of appropriate disciplinary action
7. Response and prevention—The investigation and remediation of identified systemic problems and the development of policies addressing the nonemployment and retention of sanctioned individuals

The Children's Compliance Program fosters and promotes a culture that continually strives for excellence by promotion, prevention, detection and resolution of compliance issues.

Compliance 10 years later, a milestone worth celebrating

When we set out in 1999 to voluntarily form a Compliance Program at Children's Healthcare of Atlanta, we were not sure what our full scope would be. Certainly, we were anxious about what to expect in the future. Back then, compliance was viewed as a billing and coding concept. The question that generally came to mind was: How to ensure adequate controls to guarantee proper billing?

Ten years ago, electronic medical/health record (EMR/EHR) and Health Insurance Portability Accountability Act (HIPAA) were futuristic terms. Currently, these acronyms resonate daily in our hospitals. The expansion of healthcare technology increases the challenges of remaining compliant.

Since then, our Compliance Program still encompasses these topics, but we have developed into a multifaceted program capable of handling these larger, Systemwide issues. Today, we celebrate the success of our Compliance Program, which is built on the seven elements of an effective compliance program. These core concepts have proven

to be the best way to ensure that our program remains effective.

We want to always monitor ourselves to ensure that we remain compliant—doing so is a collaborative effort. Our partnership with internal departments, such as Internal Audit, Office of the General Counsel and Risk Management, gives Children's a well-rounded Compliance Program. With increased scrutiny and the constant evolution of the healthcare sector, we want to continually mitigate our risk of noncompliance.

We also realize we have you to thank. Our motto is: Compliance begins with you. By knowing and understanding the Children's Standards of Conduct and policies, you have helped us be successful. Employee reporting has steadily increased during the past 10 years, with the positive outcomes benefitting all of us. From safety to procedural matters to quality care for our children, you have made our Compliance Program stronger. We look forward to another amazing 10 years.

The Children's Healthcare of Atlanta Compliance Connection Hotline: 877-373-0126
Report Online: <http://choa.alertline.com>

Your compliance officer: always ready to listen

As always, we encourage an open line of communication. During compliance training in New Employee Orientation, we encourage you to first speak with your supervisor about your concerns. No concern is too great or small. We will fully investigate any issue you report.

If you do not feel comfortable speaking with your supervisor, contact a Human Resources representative on your campus for employee relations concerns. For concerns about violations of the law, the Children's Standards of Conduct or the

Children's policies, report your concerns anonymously at <http://choa.alertline.com> or call the Compliance Connection Hotline at 877-373-0126 or the Compliance Office directly at ext. 57505 or ext. 57542. If you are concerned about safety or the quality of care patients are getting, contact the patient representative or nursing supervisor on your campus.

Online reporting and the Compliance Connection Hotline are available 24 hours of the day, seven days a week. Remember, compliance begins with you.

Do you know your Standards?

Is there a Standard that outlines our first responsibility at Children's?

Yes, the Quality of Care Standard says that our first responsibility is to provide quality care and services to our patients, their families, legal guardians and communities we serve. Our promise entails treating patients and their families with dignity, respect, compassion and courtesy.

Can the appearance of a conflict of interest result in penalties?

All employees, Board members and physicians are expected to avoid actual conflicts of interests and the appearance of conflicts.

We cannot use our positions to personally profit or assist others in profiting in any way at the expense of Children's. Full disclosure and appropriate action must be taken if a conflict exists.

Are there Standards related to the environment, such as hazardous waste, workplace violence, possession or consumption of alcohol or illegal drugs?

Yes, the Health and Safety Standard helps provide a safe environment for employees, patients and visitors. Remember, we want to enjoy a healthy and safe work environment. It benefits us all.

HIPAA and social media

Almost all staff and clinicians have at least one or more of these: digital cameras, cell phones, Facebook accounts and e-mail addresses. What would we do without this technology?

Remember, we are not authorized by families to take photographs for any reason besides patient care without

their consent, and are not authorized to share their information with anyone—regardless if their name is removed.

Always be careful in posting, sharing or communicating patients' information. If you are not sure, ask your leader or contact the Privacy Office at ext. 56324.

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