

# 2026 Bootcamp

Corporate Integrity



# Purpose of a Compliance Program

The Office of Inspector General (OIG) is an agency that oversees the efficiency and integrity of Medicare, Medicaid and other Health and Human Services (HHS) programs.

Per the OIG, an **effective compliance program** is critical to meeting internal operational goals; decreasing errors; improving the quality of patient care and patient safety; and preventing, detecting, and addressing fraud, waste, and abuse.



# What is an Effective Compliance Program?

The OIG has outlined the 7 steps of an effective compliance program.



*In November 2023, the OIG published General Compliance Program Guidance (GCPG) that emphasized the importance of the board's oversight of compliance.*

# Compliance Code of Conduct

Kettering Health's Corporate Integrity department has the responsibility of implementing an effective compliance program that provides reasonable assurance that Kettering Health is compliant with all federal, state, and local laws and regulations as it provides safe and effective patient care.

The Compliance Code of Conduct:

- Is the foundation of the Corporate Integrity program
- Provides guidance on how to carry out our daily activities within the appropriate ethical and legal standards
- Applies to everyone-physicians, employees, board members, volunteers and contractors



## Chief Compliance and Privacy Officer



**Audrey Adams Mondock, Esq.**  
Chief Compliance and Privacy Officer

## Compliance Manager

- Wendy Shade, BA, CCS, CCS-P

## Physician Compliance Team

- Samantha Brown, CPC, CMRS
  - Meredith Bayliff, CPC
  - Aida Scanlon, MS, PA-C

## Hospital Compliance Team

- Darlene Wright, BSN, RN, CPC, CRC
  - Macie Baker, RHIT, CCS

## Information Security & Privacy Team

- Hailey Williamson, RHIA



- Kettering Health utilizes a tool called Patient Privacy Intelligence (PPI) © to monitor user activity in health information systems that contain patient data.
- PPI automatically alerts Corporate Integrity about suspected inappropriate access of patient information.
- Suspected incidents of inappropriate access will be investigated and appropriately addressed.
- Patient health information should be accessed for legitimate business purposes only.

***We monitor Epic access to ensure patient PHI is only accessed for reasons related to an individual's role/responsibilities at Kettering Health.***

## Some Important Privacy Policies:

1. IP-KH Access to Information Systems
2. IP-KH Disclosures of Protected Health Information (PHI) to Individuals Involved in Patient's Care
3. IP-KH Employee Access to PHI
4. IP-KH Use and Disclosure of PHI for Treatment, Payment, and Healthcare Operations
5. IP-KH Workstation Use and Security
6. IP-KH Using, Requesting and Disclosing Minimum Necessary Information

**These policies can be found in Policy Manager under "Information Security and Privacy Office"**

## Safeguarding Protected Health Information (PHI):

- Limit access to medical records and workstations to authorized staff only.
- Avoid discussing patient information in hallways or waiting rooms; use private spaces for calls and consultations.
- **Minimum necessary:** PHI should not be accessed, used, or disclosed when it is not necessary to carry out a legitimate job-related function.
- Do not leave PHI unattended and face up where it's reasonable for a patient to potentially view. Dispose of patient PHI only in Shred-It Bins.
- Log off or "lock" your computer workstations when not in use.
- Protect your password. Never share your User ID and password with others. You are responsible for any activity in KH's systems using your User ID and password.

**Please report HIPAA concerns or suspected breaches promptly to your leader or Corporate Integrity!**

The Corporate Integrity team develops an annual audit plan that incorporates the various risk areas identified by regulatory bodies such as the OIG and CMS.

In addition, our team uses both internal and external resources to identify areas of risk that may be applicable to our organization regarding Fraud, Waste and Abuse.



# What Type of Audits does our Team Perform?

## Billing and Coding Audits

- CPT, HCPCS, and ICD-10-CM codes
- Modifiers
- Place of service codes

## Dangerous Drug Audits

- In-person conducted by the Corporate Integrity Team
- Self-audits conducted by the Practice (reviewed by the Corporate Integrity Team)
- Medication discrepancy

## Medical Necessity Audits

## Appropriate Documentation

- Inappropriate use of copying/pasting, cloning, etc.
- Provider signatures

## Compliance with Regulatory Guidelines

- Teaching Physicians
- Split/Shared Care
- Incident-To

## Patient Privacy (HIPAA) And Access To Health Information

- In-person walkthroughs conducted by the Corporate Integrity Team
- Self-audits conducted by the practice (reviewed by the Corporate Integrity Team)



\*This is not an all-inclusive list of what may be audited

# Applicable Laws And Risk Areas

| APPLICABLE LAWS                                       | RISK AREAS                                                                                                                                                                 |
|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Anti-Kickback Statute (AKS)                           | Acceptance of gifts from vendors/prospective vendors; timely disclosure of conflicts of interest that could affect an individual's decision-making/duty of loyalty to KH   |
| Civil Monetary Penalties Law                          | Beneficiary inducement (giving patients items/services for free or at reduced cost to entice them to seek care that may be unnecessary)                                    |
| EMTALA                                                | Providing emergency services to patients, regardless of their ability to pay                                                                                               |
| Exclusion Statute                                     | Confirming all employees, vendors, volunteers & members of the medical staff are eligible to provide care to patients (not on OIG or state exclusion lists)                |
| False Claims Act (FCA)                                | Accurate coding & billing/documentation of care provided                                                                                                                   |
| HIPAA                                                 | Protection of patient privacy                                                                                                                                              |
| Medication/Pharmacy-Related Rules (Federal and State) | Drug diversion; safe medication management/prescribing practices                                                                                                           |
| Physician Self-Referral Law (Stark)                   | Ensuring compensation, especially to billing providers, is accurate, appropriate for work performed, fair market value and for necessary services (not based on referrals) |

- Kettering Health has an anonymous and confidential hotline that is managed by a 3<sup>rd</sup> party vendor, Ethico.
- Did you know that it is your obligation and duty to report any actual or suspected wrongdoing?
- The hotline is available 24/7/365. You can report concerns via telephone or the intranet.

**You don't have to tell us who you are when you call.**

If you don't want anyone to know that you contacted us, you can anonymously call the toll-free hotline number 1-844-587-1658, which cannot be traced back to you. You may also access the Corporate Integrity intranet page and send an anonymous email of your concern by clicking on "Report a Concern."

Kettering Health understands that reporting must feel safe or it will not happen. Managers and supervisors have an obligation to create an environment that encourages employees to report concerns without fear of retaliation. It is critical that you report any violations of policies that you feel exist in the organization without fear of being punished.

## Compliance Concerns



24/7 Hotline: 1-844-587-1658

## Medication/Drug Diversion Concerns



24/7 Hotline: 1-833-220-9959

***KH strictly prohibits retaliation against any individual for reporting a concern in good faith or participating in the investigation of a concern.***

# How Can you Help us Maintain Compliance?

- Documenting accurately in the electronic medical record (EMR)
- Accessing patient information only when it is necessary to do your job
- Safeguarding Protected Health Information (PHI)
- Continuing education relevant to your position
- Reporting any actual or suspected wrongdoing via the hotline or to any Corporate Integrity employee
- Reviewing the Kettering Health Compliance Code of Conduct
- Knowing how to access policies in Policy Manager
- Asking questions, when needed

*Questions are always encouraged — they help ensure we're all on the same page.*

# Questions?

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