

Celebrating Corporate Compliance and Ethics Week

Plans and results at MJHS

By Anne Walsh

Editor's note: Anne Walsh is the Healthcare Compliance Liaison for the Metropolitan Jewish Health System. She may be reached by telephone at 718/921-7842.

When I joined the Compliance department at Metropolitan Jewish Health System in January 2007, one of my first assignments was to help plan and organize exciting activities to celebrate National Compliance and Ethics Week, coming up in May. Anne Dawson, Compliance Officer is committed to educating staff about our compliance program and was enthusiastic about using Compliance Week as an opportunity to promote compliance awareness. The goals were simple: to make sure that every employee across our system knows that we have a Compliance department and program, knows who we are, and knows how to contact us.

Two articles published in *Compliance Today* gave us valuable information and ideas: Celebrate Compliance Day and Week-Republished (June 2005), and Celebrate National Compliance & Ethics Week (April 2006). We started our campaign by ordering Compliance and Ethics Week posters and various promotional items, and designed a brochure for the compliance program, which we planned to distribute during Compliance Week and also include in all our future orientation packets.

To generate some excitement about the upcoming events, we distributed flyers for each of our programs during the week of May 13. The flyer listed the schedule of Meet and Greet sessions that were planned and announced that there would be contests and raffle prizes. We created a storyboard to take with us for our display table.

The storyboard was carefully designed to help us meet our goals. We

posted color photographs of each member of the Compliance and Legal departments with their names, titles, and phone numbers. The anonymous hotline number took center stage in large numbers and a bright red phone. The seven required elements of a compliance program, with a brief explanation of each, were listed. We gave examples of situations that employees should report and reasons why corporate compliance is important to everyone.

Each day during Compliance Week, Anne and I packed up our storyboard, handouts, and promotional items and took our show on the road, visiting nine different sites that are part of Metropolitan Jewish Health System. We set up our display table in high traffic areas and engaged the staff in impromptu compliance education. At the same time, everyone who stopped by our table had the opportunity to enter the raffle. By the end of the week, close to 700 staff members had filled out raffle tickets. The lucky winner received a Motorola Q Phone.

Staff genuinely appreciated the various promotional items we were giving away. We had candy bars with compliance messages like "Do the right thing" and "Act with integrity" on the wrappers. Smiley-faced computer duster pens were engraved with "Compliance & Ethics: A Clean Sweep!" Also on hand were pocket-sized notebooks, pencil sharpeners, etc. We made sure staff picked up a compliance program brochure and a copy of the code of conduct as well.

As we greeted the staff, we encouraged them to enter the essay contest for a chance to win a \$50 gift card. The topic was "What Corporate Integrity Means To Me." Other prizes were awarded to staff that successfully solved the Compliance Word Jumble and Crossword Puzzle, which we disseminated via the Intranet.

While we were traveling around, the privacy officers of our various programs were busy conducting telephone staff awareness surveys. They asked a few simple questions like "Who is the compliance officer?" and "Do you know what the code of conduct is?" The informa-

tion collected from these surveys serves as useful baseline information for the program.

Employees at the manager level and above were sent a Compliance Program Evaluation Tool to complete via Interoffice mail. The data collected from these tools will be invaluable to us in assessing the effectiveness of the compliance program and in the identification of areas for improvement for our 2008 Work Plan. To thank them for completing the evaluation, we gave them a laminated card with tips on "How to Set Good Ethical Standards." The back of the card lists important phone numbers and resources for obtaining compliance-related information. Each of the members of our four Compliance Committees received a recognition letter from the compliance officer and a Corporate Compliance and Ethics Week pen to thank them for their participation.

Anne included details about the week's activities, copies of the handouts, give-aways, etc. in her report to the board of directors and brought the storyboard to the meeting. Finally, the Compliance department was featured in two of our internal newsletters, with highlights of Compliance Week. The winning essay and poem have been incorporated into the compliance presentation we use for orientation and annual staff training.

The combination of written, Intranet, and face-to-face communication, which took place every day for the entire week, created much needed exposure for the program. Staff awareness was raised, informal training and education was accomplished, the hotline number and code of conduct were widely disseminated, and valuable data was collected. Our first Compliance Week Celebration was a tremendous success, and we look forward to planning this year's activities.

Kaiser Permanente Northern California celebrates National Compliance and Ethics Week

Editor's note: Benisa Berry of Ethics, Integrity and Compliance Management Systems with Kaiser Permanente Northern California (NCAL) submitted the following article which outlines their 2007 National Compliance and Ethics Week activities. The write-up appeared in Kaiser Permanente's internal newsletter and was written by Elizabeth Schainbaum. For more information, contact NCAL Regional Compliance and Privacy Office at 510/625-2400.

The wheel of compliance

By Elizabeth Schainbaum

Compliance is necessary and important, but is it fun?

Judging by the noise makers, the smiles, and applause at Thursday's compliance fair in Oakland, it certainly can be.

There were candy, popcorn, a raffle, and a Wheel of Fortune game with a host bellowing out questions through a bullhorn. Kristin Chambers, the regional compliance officer and vice president, Compliance and Privacy, was also on hand to query contestants about their "compliance IQ."

The fair is part of an effort to raise employee and physician awareness around compliance, and following the laws, policies, regulations, accreditation standards, and ethics governing the workplace.

Compliance touches many areas: hiring, patient confidentiality, conflicts of interest, vendor relations and contracts, to name a few. Educating employees and physicians about compliance makes them more aware of their obligations and ethical standards, and demonstrates KP's commitment to regulators such as the Centers for Medicare and Medicaid Services, said Benisa Berry, ethics, integrity and compliance management systems leader.

On Thursday, the Compliance Department held a seven-booth fair at the 1800 Harrison St. building that the department hopes all facilities will replicate.

The fair coincided with National Compliance and Ethics Week, May 20 to 26, and the annual compliance training, which is beginning now. The region aimed to complete the training by Oct. 31.

"It's important to get the message out there," Berry said.



Maria Mena, durable medical equipment coordinator, had to answer true or false: We all win if KP is in compliance. After saying "true," she walked away with a photo holder.

Continued on page 32

The Compliance department will determine whether the awareness campaign and trainings work. In October, the department plans to survey employees and compare this year's results against ones from last year.

The highlight of the fair was the Wheel of Fortune. One by one, employees were tested on their compliance knowledge. If they answered correctly, they could spin the wheel for a mouse pad, key chain, picture holder, tote, T-shirt, or lanyard; or they could spin again.

She said the fair was a good idea because she has had questions about compliance. Before when she wanted answers, she had turned to a co-worker. "It gives us awareness that there is help when you need it," she said. "There are a lot of people who don't know."

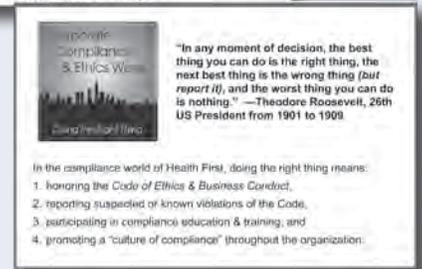
Jamila Gil, whose spin won her a new mouse pad after she correctly answered that you can get fired and sued for violating compliance, said the game was a fun way to educate employees.

"Everyone can hear the question and the answer," said the consulting manager with Management, Information and Analysis. "And the prize you get will always remind you of compliance."

Health First celebrates the third annual Corporate Compliance & Ethics Week



Tentcard printed on card stock and set out on the cafeteria and break room tables at the various Health First facilities during C & E Week



Compliance Sudoku and Scramlets distributed to associates at the various Health First facilities to do as a "just for fun" activity



We celebrated the 3rd annual Corporate Compliance & Ethics Week, June 4 - 14.

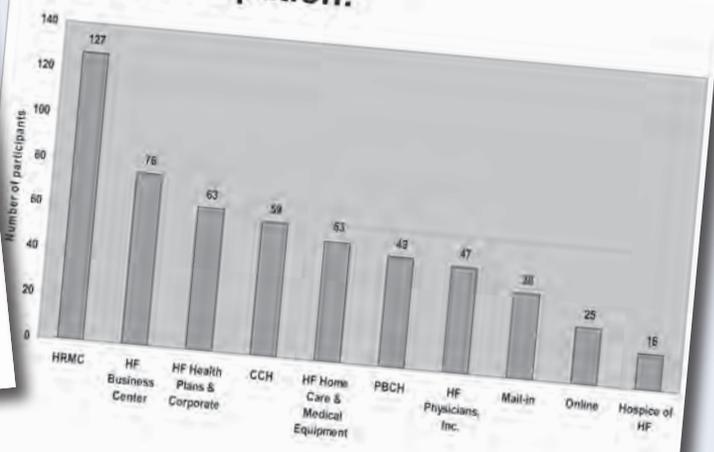
- The theme for this year's celebration was "Doing the Right Thing."
- We focused attention on the distribution of the new edition of the *Code of Ethics & Business Conduct* booklet and raising awareness about the new 24/7 Compliance & HIPAA Hotline.

- Goals:
- To increase familiarity with Compliance resources.
 - To widen exposure to the Compliance Program.
 - To provide exposure of Area Compliance Officers (ACOs) to associates.
 - To spur questions pertaining to compliance concerns.

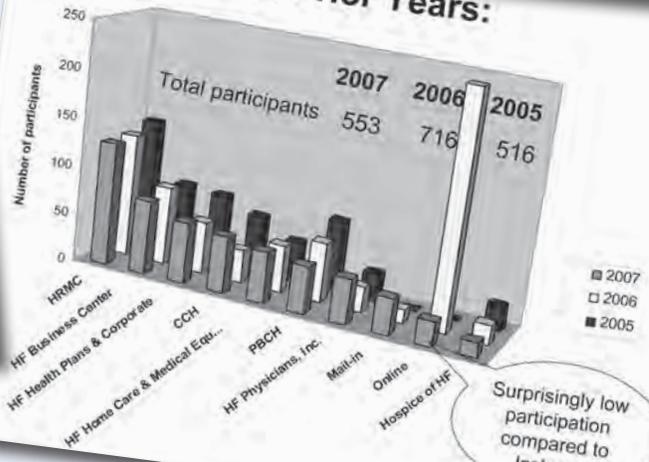
Plans:

- Visited entities - Health Plans, PBCH, HFPI, Business Center, Hospice, HRMC, CCH, Home Care, Medical Equipment
- Mingled with associates - CCO, ACO & Sr. Compliance Analyst
- Set up display table - display board, poster, Inservice-to-Go, quiz, Sudoku & Scramlets, snacks, prizes
- Provided all information online via Inside Health First, including an online quiz

2007 Participation:



Comparison to Prior Years:



Surprisingly low participation compared to last year

Schedule of events:

- Monday, June 4th:** 11 am - 1 pm PBCH Cafeteria
- Tuesday, June 5th:** 9 - 10 am Health First Health Plans; 11:30 am - 1 pm Health First Business Center
- Wednesday, June 6th:** 8:30 - 9 am Health First Medical Equipment; 11 am - 1 pm CCH Cafeteria
- Thursday, June 7th:** 8:30 - 9 am Hospice of Health First; 2 - 3 pm Health First Physicians, Inc.
- Friday, June 8th:** 11 am - 1 pm HRMC Cafeteria
- Tuesday, June 12th:** Noon - 1 pm Health First Home Care - Melbourne
- Tuesday, June 14th:** Noon - 1 pm Health First Home Care - Merritt Island

PowerPoint presentation to the Corporate Compliance Committee providing a summary of the Week's activities and participation

3rd ANNUAL CORPORATE COMPLIANCE & ETHICS WEEK PRIZE DISTRIBUTION 2007

Online:	• 2 honeybaked ham \$10 gift certificates	CCH:	• 1 beach towel • 1 bullet mug
Mail-in:	• 2 honeybaked ham \$10 gift certificate	Hospice:	• 1 honeybaked ham \$10 gift certificate
PBCH:	• 1 month membership at Pro-Health & Fitness • 1 beach chair	HFPI:	• 1 beach chair
HFHP:	• 1 beach towel • 1 beach chair	HRMC:	• 1 honeybaked ham \$10 gift certificate • 1 basic manicure • 1 beach chair • 1 bullet mug
HF Business Center:	• 1 beach towel • 1 bullet mug	HFHC - Melbourne:	• 1 honeybaked ham \$10 gift certificate
HF Medical Equipment:	• 1 beach towel	HFHC - Merritt Island:	• 1 bullet mug

Prize distribution list

National Corporate Compliance & Ethics Week

An "education moment"!

- Chat with your CCO, ACO, & Compliance Analyst
- Ask those compliance questions you always wondered about...
- Enjoy some cookies --munch, munch, munch!
- Take the Compliance & Business Ethics Inservice-to-Go and Quiz
- you might just win a prize!

- ### Area Compliance Officers (ACOs)
- Donna Small, Med Gp Info System Manager, HF Physicians, Inc.
 - Jim Kendig, VP, Safety & Security, HRMC
 - Betty Kennard, VP, Operations & Compliance, HF Health Plans
 - Chris Sorensen, Director, Risk Management, CCH

PowerPoint presentation of key topics presented in storyboard format at the various Health First facilities during the week

New version of the Code!

- The 6th edition of the *Code of Ethics & Business Conduct* is being distributed to all associates.
- The "Certification Statement" must be completed and returned to your Human Resources Administrator.

New HOTLINE!

- Outside, independent vendor provides hotline answering service during all hours of operation.
- Each call is handled according to a uniform, consistent protocol by a professionally trained live operator, ensuring confidentiality and anonymity.

No retaliation!

Question: If I report something suspicious, will I get into trouble if my suspicion turns out wrong?

Answer: If you have an honest concern, our policy protects you from being reprimanded or punished. As a Health First associate, you're responsible for reporting suspected problems. All circumstances will be investigated and no action will be taken against you for your report.

Thank you!

We recognize every associate's commitment to the compliance process. Thank you for your continued support & participation in this program.



It's up to ALL of us!

Quiz distributed to associates at the various Health First facilities to cover knowledge of key topics; served as entry in prize drawings at each facility; also available online; additionally, an online, electronically-formatted quiz was available via a link from the announcements section on the home page of Inside Health First

Compliance & Business Ethics Inservice-to-Go

Health First's Corporate Ethics and Compliance Program provides the means to deter wrongdoing and promote values of integrity, honesty, fairness, and responsibility in all our dealings. The program was designed and developed to comply with all healthcare laws and regulations that apply to or affect the business of Health First, in addition to guidelines of the Office of Inspector General for a comprehensive and effective compliance program.

Because corporate compliance activities affect each of us in our daily roles as Health First associates, it's our responsibility to understand and follow the standards set forth in Health First's Code of Ethics & Business Conduct. Once each associate receives and reads the new version of the Code of Ethics & Business Conduct, he/she must complete the Certification Statement located on the front cover of the booklet and return it to his/her supervisor for submission to the entity's Human Resources Administrator.

Whenever there's a question concerning obligations under the Code or otherwise, we're first encouraged to seek guidance from supervisors or managers. Area Compliance Officers (ACOs) are also available throughout the organization to provide compliance support. In the Corporate Compliance Department, Justin Fox is available as Health First's Chief Compliance Officer and is responsible for all aspects of the Corporate Ethics and Compliance Program. Alternatively, the Compliance & HIPAA HOTLINE (1-888-896-4912) is available 24/7 whenever a compliance question or concern arises.

And remember that Health First has a "no retaliation policy" meaning that if an honest concern arises and is reported, policy prohibits associates from being reprimanded or disciplined, even if the suspicion turns out to be wrong. No action will be taken against an associate for reporting a concern.

Only through our individual and combined efforts can we maintain a culture of compliance within our organization. We must each make the commitment to do what's right for the sake of doing what's right. That's the Health First way.

Inservice-to-Go displayed on the storyboard and distributed at the various Health First facilities to cover key topics

Compliance & Business Ethics Quiz

- As a Health First associate, it's my responsibility to understand and follow the standards set forth in the Code of Ethics & Business Conduct. I must complete the Certification Statement (fill in the blank) _____
- After I receive and read the new version of the Code of Ethics & Business Conduct, I must complete the Certification Statement (fill in the blank) and submit it to my supervisor. _____
- Who is the Chief Compliance Officer? _____
- What is the new Compliance & HIPAA HOTLINE number? _____
- What does "no retaliation" mean? _____
- To be entered into prize drawing, please provide your name, facility, department, extension, and phone number (only one entry per associate will be included in the drawing). _____

Place in interoffice mail to Stephanie Reiter, Chief Compliance Officer. Thank you for participating!

Directives for Directors

Code distribution/certification:

- Receive via interoffice mail
- Distribute to all associates
- Emphasize mandatory completion of Certification Statement
- Ensure receipt of completed statements & forward to HR Administrator

Compliance week celebration:

- Post flier, Inservice-to-Go, & quiz
- Encourage associate participation at site visit or online (prizes available)

HOTLINE awareness:

- Replace posters
- Educate associates on new number
- Emphasize no retaliation & 24/7 live operator availability

Handout to the directors distributed by the Chief Compliance Officer at the various facilities' department head meetings to engage the directors to encourage associate participation in the Week's activities



PowerPoint slide showing picture collage of 2006 display and associates participating in activities at one of the facilities

Flier posted in prominent locations throughout Health First facilities announcing C & E Week's activities

Health First

Upcoming events:

"Doing the Right Thing"

Monday, June 4th:
11 am - 1 pm
PBCH Cafeteria

Tuesday, June 5th:
9 - 10 am
Health First Health Plans
11:30 am - 1 pm
Health First Business Center

Wednesday, June 6th:
8:30 - 9 am
Health First Medical Equipment
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Thursday, June 7th:
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Friday, June 8th:
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HRMC Cafeteria

Tuesday, June 12th:
Noon - 1 pm
Health First Home Care - Melbourne

Thursday, June 14th:
Noon - 1 pm
Health First Home Care - Merritt Island

Celebrating the 3rd Annual Corporate Compliance & Ethics Week

Please visit our information table for refreshments, giveaways & an "education moment."

During Corporate Compliance & Ethics Week, we recognize every associate's commitment to the compliance process. Thank you!

Health First

CORPORATE COMPLIANCE

Your call matters.
Report Compliance concerns
1.888.400.4512
We can't do it without you.

Take a proactive stance.
All calls will be handled confidentially and may be made anonymously.

The Compliance & HIPAA Hotline is available 24/7 for you to report suspected violations. No retaliation. No retribution.

Compliance: The Cornerstone of the Organization

Judith Fox, VP
Chief Compliance Officer

Spring Campaign Winners
(photos of winners will appear in the June Associates' Press):
• Naida Cross, RN, HRMC OR
• Wilma Eastmore, observation tech, HRMC, Radiology Holding Unit
• David Scripps, RN III, HRMC, CCU
• Kelly Jett, lead cardiac anesthesia tech, HRMC OR
• Ashley Mariner Case Management Assistant, PHCH HRMC OR
• Juliana Owens, RN, CCH Medical/Surgical/Oncology Unit

Winner's Circle
From left: Esther Dornan, CCH Pharmaceutical and Health Ideas Specialist and James Lewis, CCH inpatient tech and Health Ideas Trainer and Paul Zilber, Call manager

Idea submitter: James Smith, CCH Sr. medical tech
Idea summary: Replace old CO, absorbent with Amnorb Plus CO, absorbent.
Cost savings: \$86,028 annual savings systemwide
Award: \$1,000
Healthy Ideas Specialist: Leslie Burton

Idea submitter: Jamie Forrest, HFHR Group Services manager
Idea summary: Jamie noticed there was a lot of waste in the supplies provided in the kitchen and developed an idea to adopt some changes. Simply changing to a lower cost paper cup and paper plate not only resulted in a cost savings, but had a positive impact for the environment.
Cost savings: \$2,096.45
Award: \$250

Healthy Ideas reaches \$1 million in HF cost savings
As of 4/30/2007 HF associates utilizing the Healthy Ideas Associate Suggestion Program had saved Health First \$1,039,870.

New compliance poster displayed on the storyboard and distributed at the various Health First facilities

Healthy Ideas

Spring Campaign Winners
(photos of winners will appear in the June Associates' Press):
• Naida Cross, RN, HRMC OR
• Wilma Eastmore, observation tech, HRMC, Radiology Holding Unit
• David Scripps, RN III, HRMC, CCU
• Kelly Jett, lead cardiac anesthesia tech, HRMC OR
• Ashley Mariner Case Management Assistant, PHCH HRMC OR
• Juliana Owens, RN, CCH Medical/Surgical/Oncology Unit

Winner's Circle
From left: Esther Dornan, CCH Pharmaceutical and Health Ideas Specialist and James Lewis, CCH inpatient tech and Health Ideas Trainer and Paul Zilber, Call manager

Idea submitter: James Smith, CCH Sr. medical tech
Idea summary: Replace old CO, absorbent with Amnorb Plus CO, absorbent.
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Compliance Corner

By Judith M. Fox, VP/Chief Compliance Officer and Stephanie Reid, Compliance Analyst

Corporate Compliance & Ethics Week
May 20-26, 2007
Doing the Right Thing

Each year, National Corporate Compliance & Ethics Week is celebrated. This year it's being celebrated May 20 to 26, 2007 and the theme is "Doing the Right Thing." We urge all associates to conscientiously observe the Code of Ethics Week, as it provides a great opportunity to increase awareness of our Corporate Compliance Program.

In observance of this special week, Corporate Compliance is putting out the 1st edition of the Code of Ethics & Business Corner. You might recall that the 1st edition is available exclusively online and is a thorough, but lengthy document. We've revised it significantly for the 1st edition, reducing the length to cover key aspects of the Compliance Program, and enabling us to print a booklet for each associate. We've placed with the outcome and look forward to presenting the new Code within the next month. In addition, this is the perfect time to announce that a new full-time Compliance & HIPAA HOTLINE will be available in all shifts, 24 hours per day, 365 days per year. As always, calls will be handled in a completely confidential manner. Stop missed for more specific details about this new service.

Thank you in advance for your participation in Corporate Compliance & Ethics Week and for your ongoing support of our Compliance Program. For ongoing assistance or questions, please contact the Corporate Compliance Office at 434-5647.

Associates' Press
May 2007

We're celebrating! National Nurses' Week and National Hospital & Healthcare Week May 6 to 12

Join us in celebrating both National Nurses' Week and National Hospital & Healthcare Week, May 6 to 12, with over more than 6,000 fellow associates and over more than 1,500 caring nurses at the following events at each of our hospitals. These celebrations are designed to recognize what each of you do for our patients and their families, for our community and for each other 24/7, every day of the year.

Nurses' Week events
Monday, May 7, 11:30 am to 12:30 pm
• Ice Cream Social in HRMC downstairs kitchen
Tuesday, May 8, 11:30 am to 12:30 pm
• Complimentary meal served in the HRMC multi corridor
Wednesday, May 9, 10:30 am, Cape
• 7 pm to 7 am Nursing (cont. on page 3)

National Hospital & Healthcare Week events: Corporate, HFHR, and eICU celebrations
Tuesday, May 8, 11:30 am to 12:30 pm
• Complimentary meal served in the HRMC multi corridor
Wednesday, May 9, 11:30 am to 1 pm
• Ice Cream Social in downstairs kitchen
Thursday, May 10, noon to 1 pm
• Complimentary meal, cook-out on the patio (burgers and hot dogs with all the trimmings)

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NEWS FOR HEALTH FIRST ASSOCIATES

May 2007 edition of Associates' Press with Compliance Corner article on page 6 announcing C & E Week's celebration and key topics