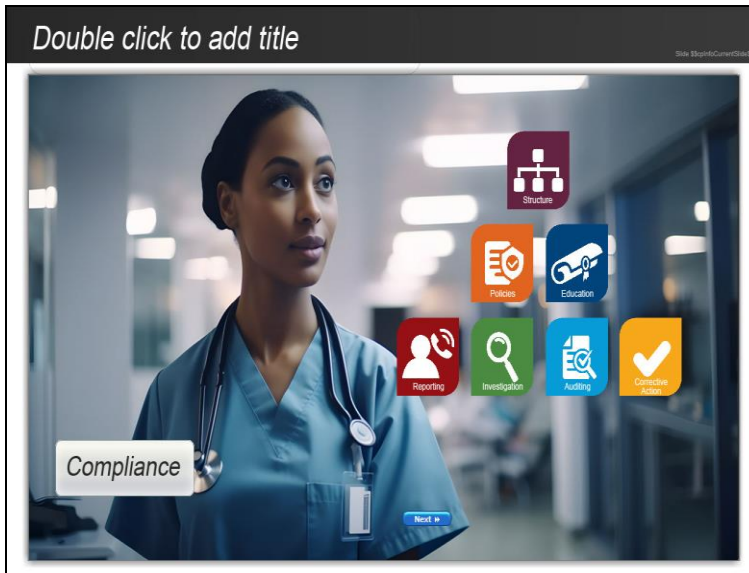


Slide1



Properties:

Display Time	: 15.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Image : C:\Users\AppData\Local\Temp\Clipboard13136430221890.BMP
- 2) Text Caption : Compliance
- 3) Button
- 4) Button
- 5) Button

Slide2

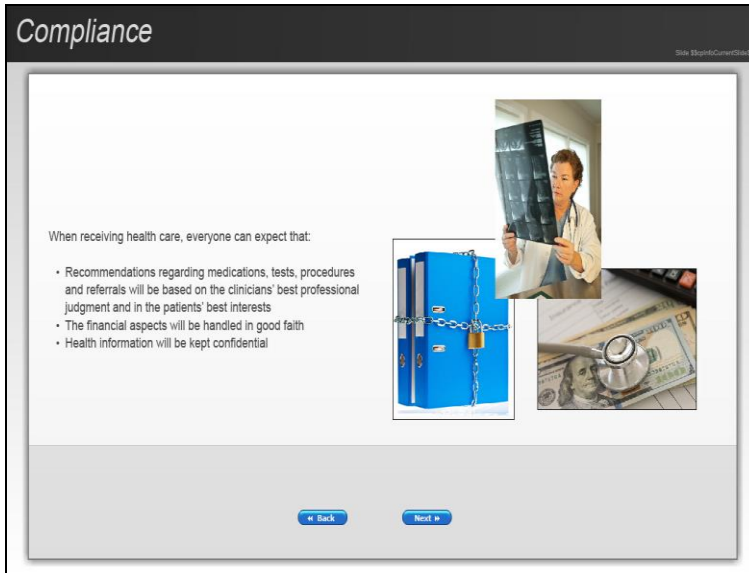
Properties:

Display Time	: 15.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : This course does not use audio
- 2) Image : C:\Users\AppData\Local\Temp\Clipboard4276600730272.BMP
- 3) Text Caption : Please allow 15 min to meaningfully participate in this course
- 4) Image : C:\Users\Pictures\time.png

Slide3



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : When receiving health care, everyone can expect that:

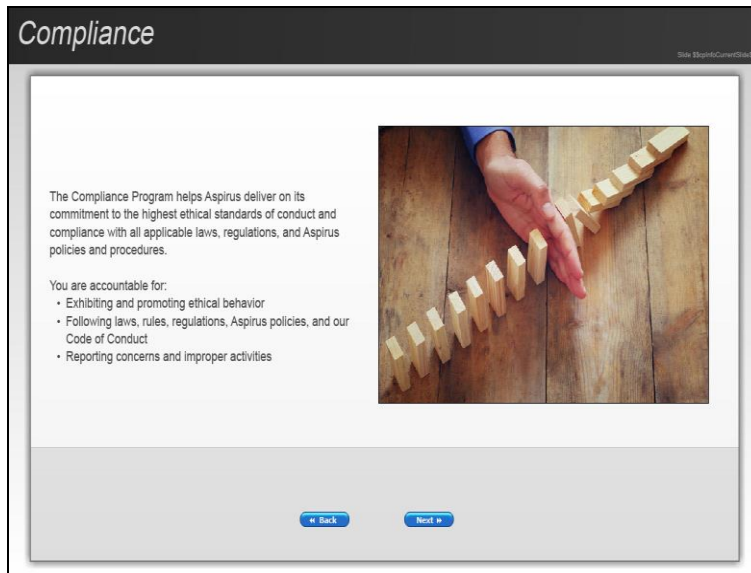
Recommendations regarding medications, tests, procedures and referrals will be based on the clinicians' best professional judgment and in the patients' best interests

The financial aspects will be handled in good faith

Health information will be kept confidential

- 3) Image : C:\Users\\Pictures\Compliance\Cleared\shutterstock_529270987.png
- 4) Image : C:\Users\\Pictures\Compliance\Cleared\shutterstock_78064039.png
- 5) Image : C:\Users\\Pictures\Compliance\Cleared\shutterstock_41520394.png

Slide4



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

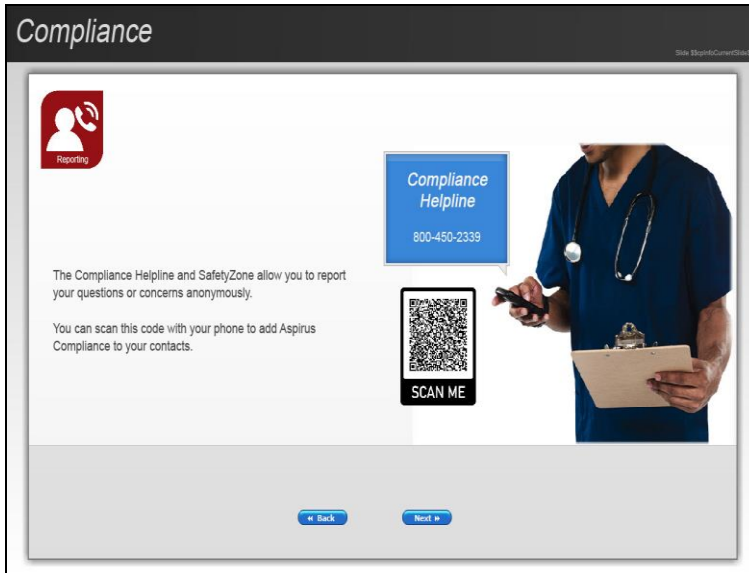
- 1) Text Caption : Compliance
- 2) Text Caption : The Compliance Program helps Aspirus deliver on its commitment to the highest ethical standards of conduct and compliance with all applicable laws, regulations, and Aspirus policies and procedures.

You are accountable for:

- Exhibiting and promoting ethical behavior
- Following laws, rules, regulations, Aspirus policies, and our Code of Conduct
- Reporting concerns and improper activities

- 3) Image : C:\Users\ Pictures\Compliance\Cleared\shutterstock_358695386.png

Slide5



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

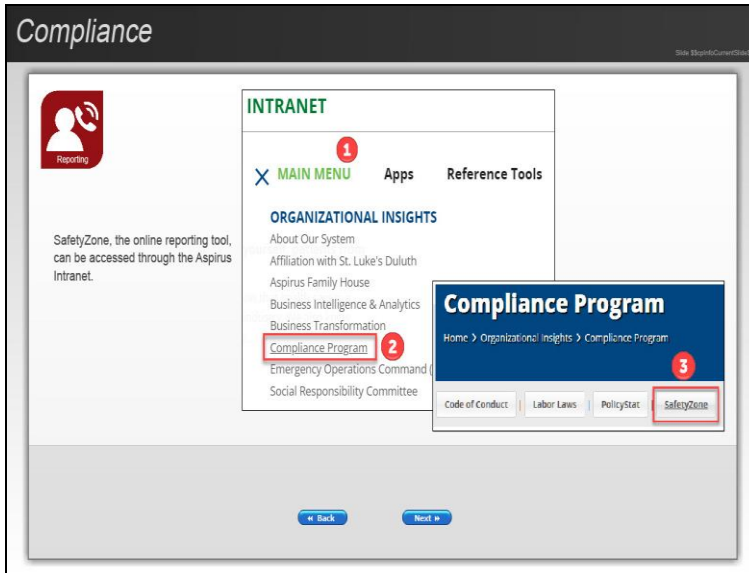
Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : The Compliance Helpline and SafetyZone allow you to report your questions or concerns anonymously.

You can scan this code with your phone to add Aspirus Compliance to your contacts.

- 3) Image : C:\Users\Pictures\Compliance\shutterstock_125866850.png
- 4) Text Caption : Compliance Helpline
- 800-450-2339
- 5) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-04 Reporting.png
- 6) Text Caption : Reporting
- 7) Image : S:\JonK\Course_Reviews\Compliance\compliance-helpline-qr.png

Slide6



Properties:

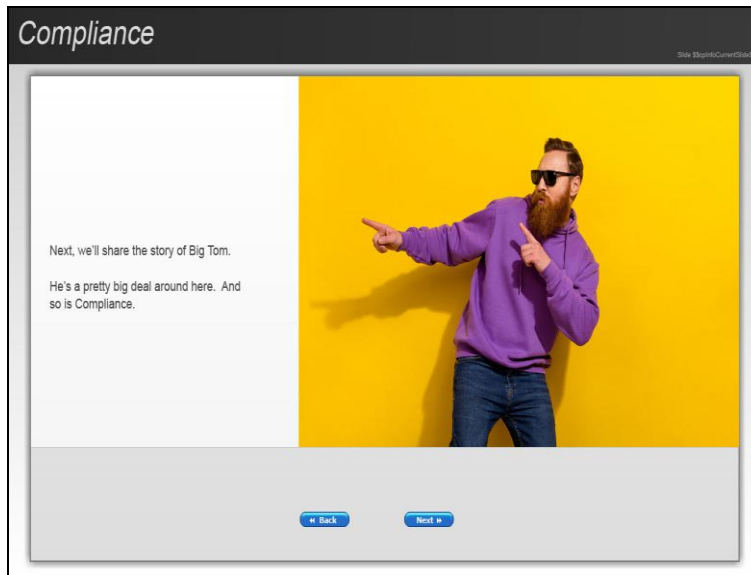
Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : SafetyZone, the online reporting tool, can be accessed through the Aspirus Intranet.

- 3) Image : C:\Users\AppData\Local\Temp\Clipboard197646480093.BMP
- 4) Image : C:\Users\AppData\Local\Temp\Clipboard197646427406.PNG

Slide7



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

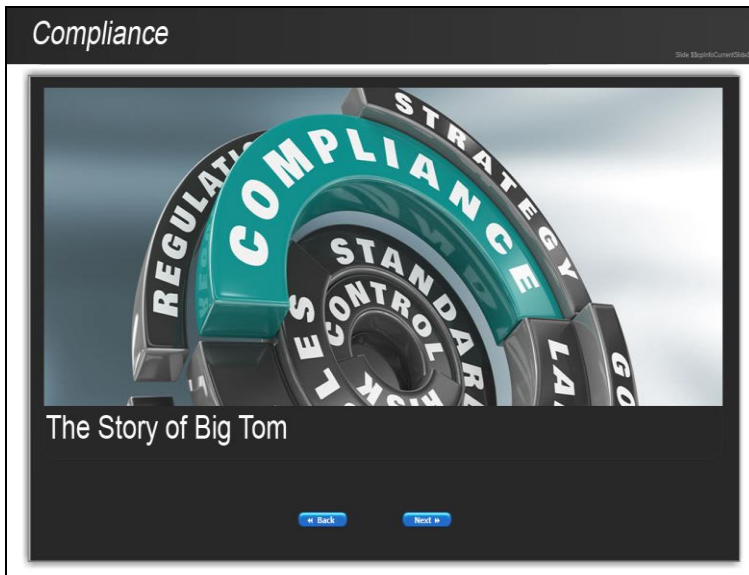
Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Next, we'll share the story of Big Tom.

He's a pretty big deal around here. And so is Compliance.

- 3) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_516936264-487.jpeg

Slide8



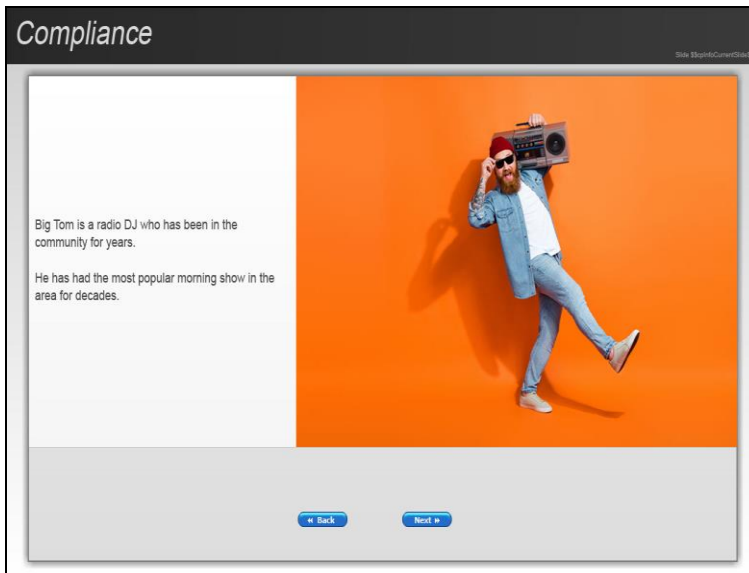
Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

1) Image : S:\JonK\Graphic Request 01\Cleared\shutterstock_206712397sm.jpg

Slide9



Properties:

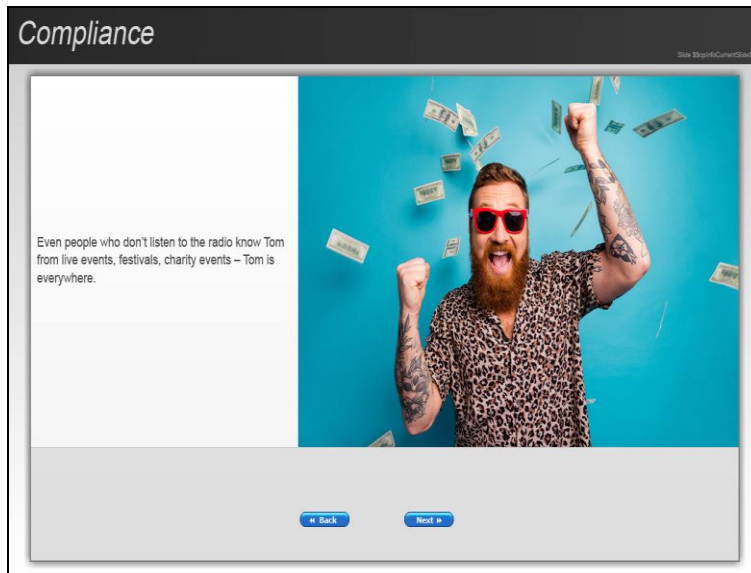
Display Time	: 10.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Image : C:\Users\AppData\Local\Temp\Clipboard19856419550671.BMP
- 3) Text Caption : Big Tom is a radio DJ who has been in the community for years.

He has had the most popular morning show in the area for decades.

Slide10



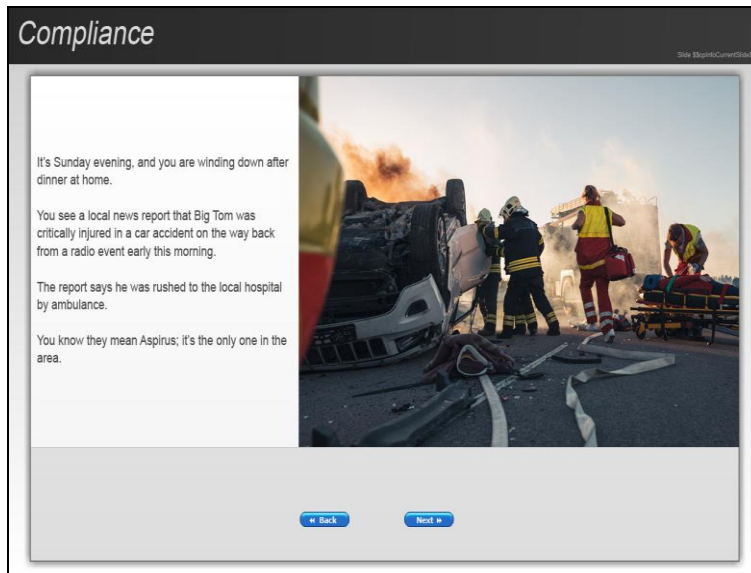
Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Even people who don't listen to the radio know Tom from live events, festivals, charity events – Tom is everywhere.
- 3) Image : C:\Users\\AppData\Local\Temp\Clipboard19856420858234.BMP

Slide11



Properties:

Display Time	: 9.90sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : It's Sunday evening, and you are winding down after dinner at home.

You see a local news report that Big Tom was critically injured in a car accident on the way back from a radio event early this morning.

The report says he was rushed to the local hospital by ambulance.

You know they mean Aspirus; it's the only one in the area.

- 3) Image : C:\Users\AppData\Local\Temp\Clipboard19856420457312.BMP


Slide12

Compliance

By morning, news and social media are filled with reports and messages of support for Big Tom.

As you arrive to work, you see dozens of people with banners and signs of support for Tom gathered across the street from the hospital.

You go in and start your day. You are glad when you find the morning has flown by, and it's time for a break.



◀ Back Next ▶

Properties:

Display Time	: 9.70sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : By morning, news and social media are filled with reports and messages of support for Big Tom.

As you arrive to work, you see dozens of people with banners and signs of support for Tom gathered across the street from the hospital.

You go in and start your day. You are glad when you find the morning has flown by, and it's time for a break.

- 3) Image : C:\Users\AppData\Local\Temp\Clipboard19856420311234.BMP


Slide13

Compliance Site: EboniCarter0613

On your way to lunch, you see Big Tom, but he doesn't look like himself.

He's lying on a cart, unconscious, being wheeled towards the ICU by a team of people.

You step to the side to let them pass. Tom looks shockingly pale.



[Back](#) [Next](#)

Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

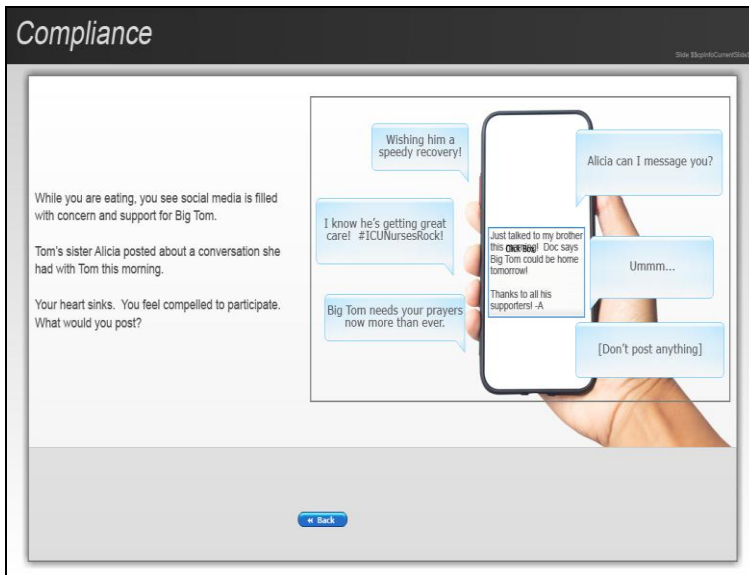
Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : On your way to lunch, you see Big Tom, but he doesn't look like himself.

He's lying on a cart, unconscious, being wheeled towards the ICU by a team of people.

You step to the side to let them pass. Tom looks shockingly pale.
- 3) Image : C:\Users\AppData\Local\Temp\Clipboard13136429800953.BMP

Slide14



Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : While you are eating, you see social media is filled with concern and support for Big Tom.

Tom's sister Alicia posted about a conversation she had with Tom this morning.

Your heart sinks. You feel compelled to participate. What would you post?

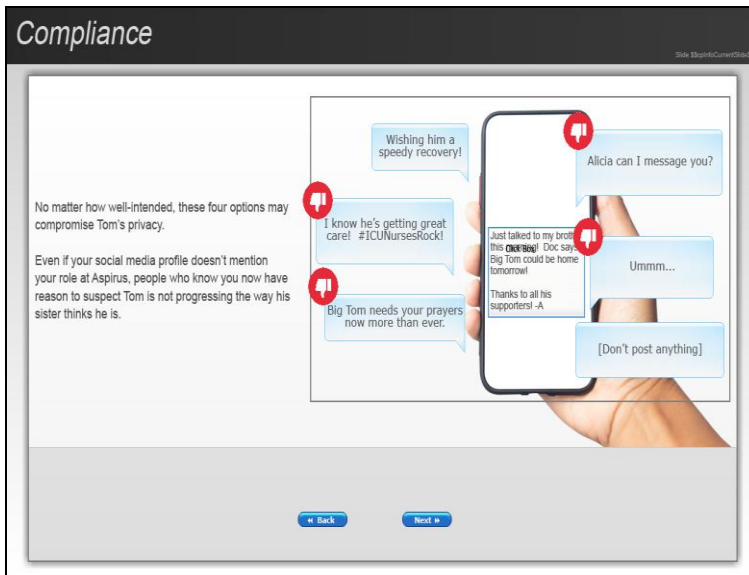
- 6) Image : C:\Users\...\AppData\Local\Temp\Clipboard13136429461562.PNG
- 7) Text Caption : Just talked to my brother this morning! Doc says Big Tom could be home tomorrow!

Thanks to all his supporters! -A

- 8) Text Caption : Wishing him a speedy recovery!
- 9) Text Caption : I know he's getting great care! #ICUNursesRock!
- 10) Text Caption : Big Tom needs your prayers now more than ever.
- 11) Text Caption : Ummm...

- 12) Text Caption : Alicia can I message you?
- 13) Text Caption : [Don't post anything]
- 14) Click Box

Slide15



Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : No matter how well-intended, these four options may compromise Tom's privacy.

Even if your social media profile doesn't mention your role at Aspirus, people who know you now have reason to suspect Tom is not progressing the way his sister thinks he is.

- 3) Image : C:\Users\AppData\Local\Temp\Clipboard13136429461562.PNG
- 4) Text Caption : Just talked to my brother this morning! Doc says Big Tom could be home tomorrow!

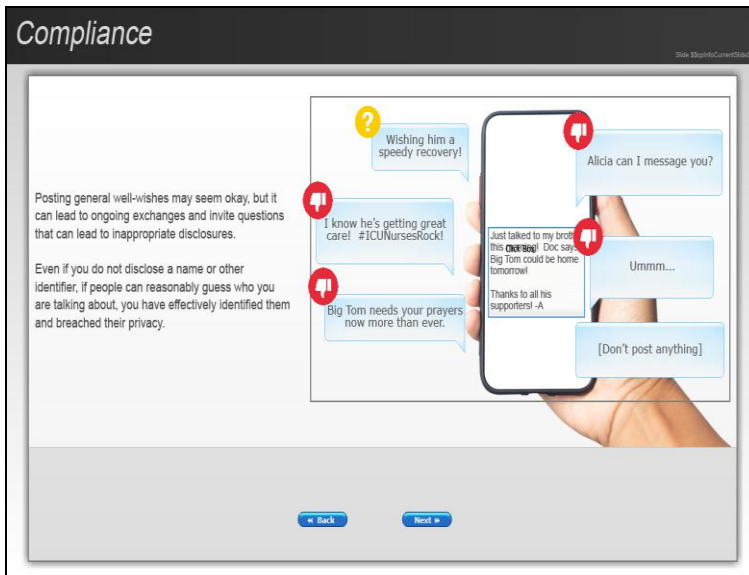
Thanks to all his supporters! -A

- 5) Text Caption : Wishing him a speedy recovery!
- 6) Text Caption : I know he's getting great care! #ICUNursesRock!
- 7) Text Caption : Big Tom needs your prayers now more than ever.
- 8) Text Caption : Ummm...
- 9) Text Caption : Alicia can I message you?
- 10) Text Caption : [Don't post anything]
- 11) Click Box
- 12) Image : C:\Users\Pictures\Stock Images\thumbsdown.png
- 13) Image : C:\Users\Pictures\Stock Images\thumbsdown.png

14) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png

15) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png

Slide16



Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Posting general well-wishes may seem okay, but it can lead to ongoing exchanges and invite questions that can lead to inappropriate disclosures.

Even if you do not disclose a name or other identifier, if people can reasonably guess who you are talking about, you have effectively identified them and breached their privacy.

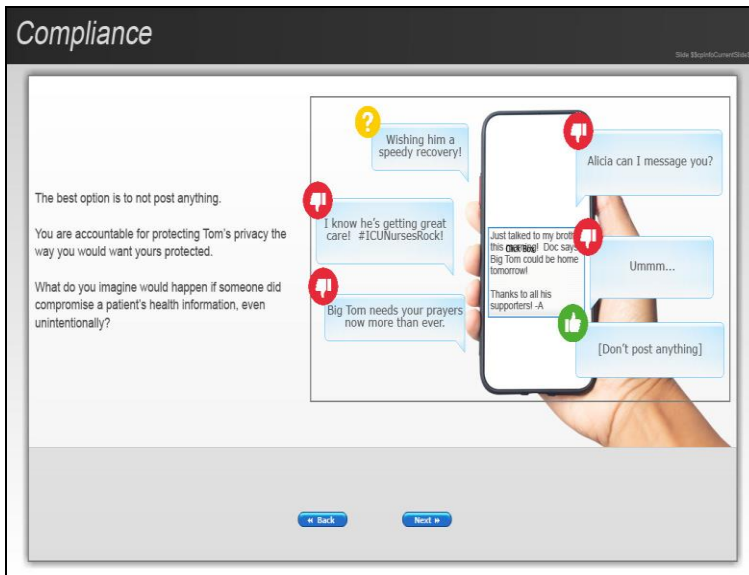
- 3) Image : C:\Users\AppData\Local\Temp\Clipboard13136429461562.PNG
- 4) Text Caption : Just talked to my brother this morning! Doc says Big Tom could be home tomorrow!

Thanks to all his supporters! -A

- 5) Text Caption : Wishing him a speedy recovery!
- 6) Text Caption : I know he's getting great care! #ICUNursesRock!
- 7) Text Caption : Big Tom needs your prayers now more than ever.
- 8) Text Caption : Ummm...
- 9) Text Caption : Alicia can I message you?
- 10) Text Caption : [Don't post anything]
- 11) Click Box
- 12) Image : C:\Users\Pictures\Stock Images\thumbsdown.png

- 13) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 14) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 15) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 16) Image : C:\Users\\Pictures\Stock Images\question.png

Slide17



Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : The best option is to not post anything.

You are accountable for protecting Tom's privacy the way you would want yours protected.

What do you imagine would happen if someone did compromise a patient's health information, even unintentionally?

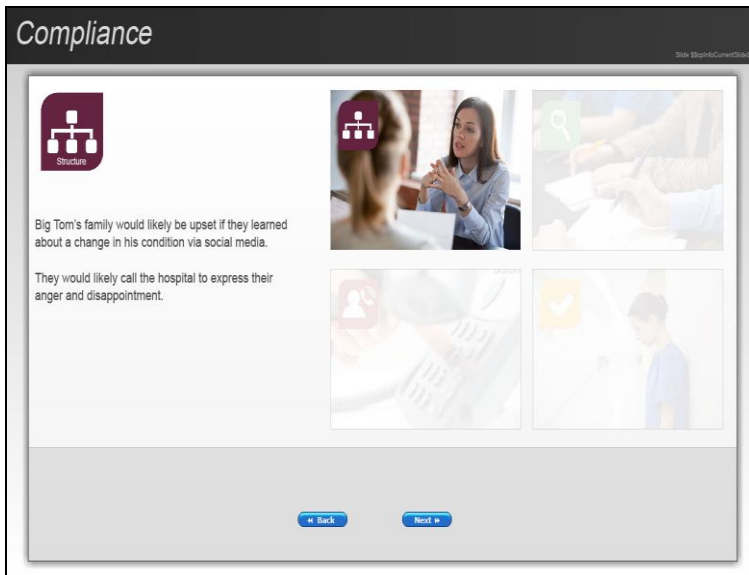
- 3) Image : C:\Users\\AppData\Local\Temp\Clipboard13136429461562.PNG
- 4) Text Caption : Just talked to my brother this morning! Doc says Big Tom could be home tomorrow!

Thanks to all his supporters! -A

- 5) Text Caption : Wishing him a speedy recovery!
- 6) Text Caption : I know he's getting great care! #ICUNursesRock!
- 7) Text Caption : Big Tom needs your prayers now more than ever.
- 8) Text Caption : Ummm...
- 9) Text Caption : Alicia can I message you?
- 10) Text Caption : [Don't post anything]
- 11) Click Box

- 12) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 13) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 14) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 15) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 16) Image : C:\Users\\Pictures\Stock Images\question.png
- 17) Image : C:\Users\\Pictures\Stock Images\thumbsup.png

Slide18



Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Button
- 6) Button
- 7) Button
- 8) Text Caption : Big Tom's family would likely be upset if they learned about a change in his condition via social media.

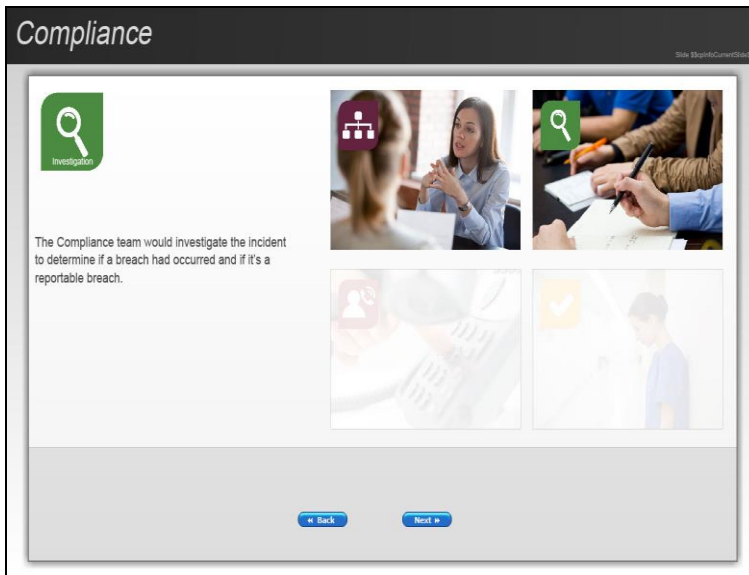
They would likely call the hospital to express their anger and disappointment.

- 9) Image : C:\Users\AppData\Local\Temp\Clipboard10380507303468.BMP
- 10) Image : C:\Users\AppData\Local\Temp\Clipboard10380509451015.BMP
- 11) Image : C:\Users\AppData\Local\Temp\Clipboard10380509492984.BMP
- 12) Image : C:\Users\AppData\Local\Temp\Clipboard10380510220906.BMP
- 13) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-06 Corrective.png
- 14) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-05 Investigation.png
- 15) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons - 01 Structure.png
- 16) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-04 Reporting.png

17) Image : C:\Users\\Pictures\Compliance\CC-013 Compliance Icons - 01 Structure.png

18) Text Caption : Structure

Slide19



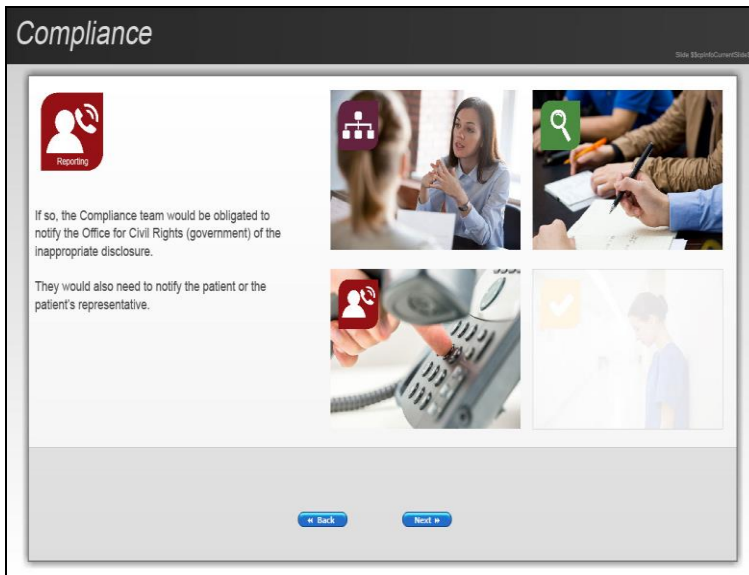
Properties:

Display Time	:	10.30sec
Transition	:	No Transition
Navigation	:	No Action
Audio	:	None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Button
- 6) Button
- 7) Button
- 8) Text Caption : The Compliance team would investigate the incident to determine if a breach had occurred and if it's a reportable breach.
- 9) Image : C:\Users\AppData\Local\Temp\Clipboard10380507303468.BMP
- 10) Image : C:\Users\AppData\Local\Temp\Clipboard10380509451015.BMP
- 11) Image : C:\Users\AppData\Local\Temp\Clipboard10380509492984.BMP
- 12) Image : C:\Users\AppData\Local\Temp\Clipboard10380510220906.BMP
- 13) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-06 Corrective.png
- 14) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-05 Investigation.png
- 15) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons - 01 Structure.png
- 16) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-04 Reporting.png
- 17) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-05 Investigation.png
- 18) Text Caption : Investigation

Slide20



Properties:

Display Time	:	10.30sec
Transition	:	No Transition
Navigation	:	No Action
Audio	:	None

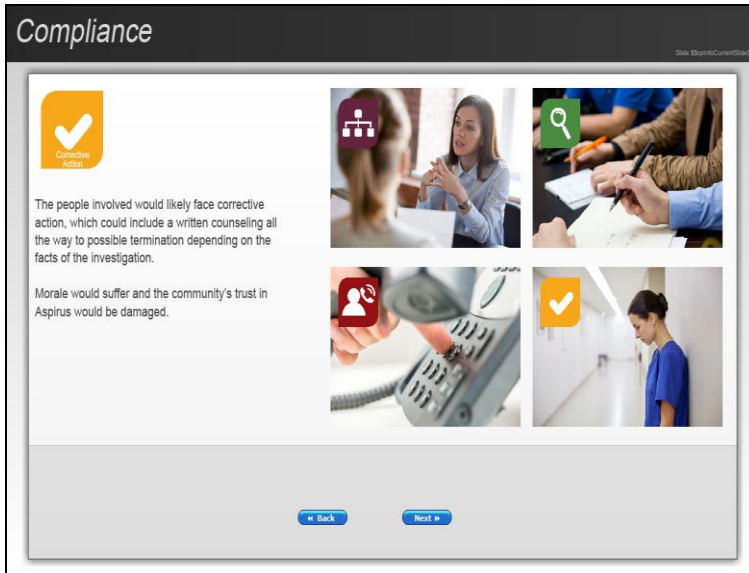
Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Button
- 6) Button
- 7) Button
- 8) Text Caption : If so, the Compliance team would be obligated to notify the Office for Civil Rights (government) of the inappropriate disclosure.

They would also need to notify the patient or the patient's representative.

- 9) Image : C:\Users\AppData\Local\Temp\Clipboard10380507303468.BMP
- 10) Image : C:\Users\AppData\Local\Temp\Clipboard10380509451015.BMP
- 11) Image : C:\Users\AppData\Local\Temp\Clipboard10380509492984.BMP
- 12) Image : C:\Users\AppData\Local\Temp\Clipboard10380510220906.BMP
- 13) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-06 Corrective.png
- 14) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-05 Investigation.png
- 15) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons - 01 Structure.png
- 16) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-04 Reporting.png

Slide21



Properties:

Display Time	:	10.30sec
Transition	:	No Transition
Navigation	:	No Action
Audio	:	None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Button
- 6) Button
- 7) Button
- 8) Text Caption :

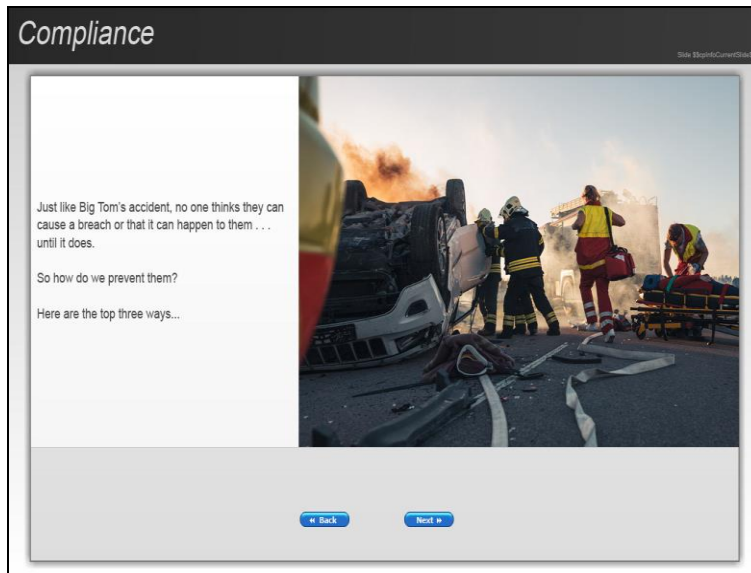
The people involved would likely face corrective action, which could include a written counseling all the way to possible termination depending on the facts of the investigation.

Morale would suffer and the community's trust in Aspirus would be damaged.

- 9) Image : C:\Users\AppData\Local\Temp\Clipboard10380507303468.BMP
- 10) Image : C:\Users\AppData\Local\Temp\Clipboard10380509451015.BMP
- 11) Image : C:\Users\AppData\Local\Temp\Clipboard10380509492984.BMP
- 12) Image : C:\Users\AppData\Local\Temp\Clipboard10380510220906.BMP
- 13) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-06 Corrective.png
- 14) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-05 Investigation.png

- 15) Image : C:\Users\\Pictures\Compliance\CC-013 Compliance Icons - 01 Structure.png
- 16) Image : C:\Users\\Pictures\Compliance\CC-013 Compliance Icons-04 Reporting.png
- 17) Image : C:\Users\\Pictures\Compliance\CC-013 Compliance Icons-06 Corrective.png
- 18) Text Caption : Corrective Action

Slide22



Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

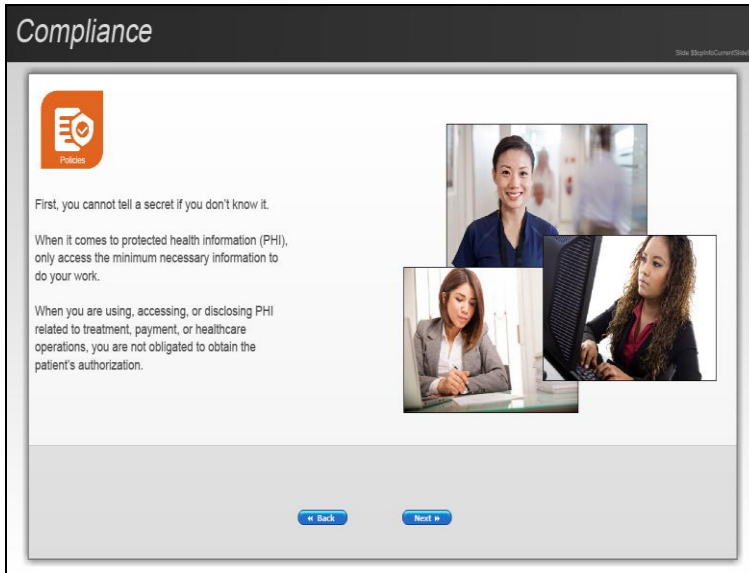
- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Button
- 6) Button
- 7) Button
- 8) Text Caption : Just like Big Tom's accident, no one thinks they can cause a breach or that it can happen to them . . . until it does.

So how do we prevent them?

Here are the top three ways...

- 9) Image : C:\Users\AppData\Local\Temp\Clipboard19856420457312.BMP

Slide23



Properties:

Display Time	:	10.30sec
Transition	:	No Transition
Navigation	:	No Action
Audio	:	None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Button
- 6) Button
- 7) Button
- 8) Text Caption :

First, you cannot tell a secret if you don't know it.

When it comes to protected health information (PHI), only access the minimum necessary information to do your work.

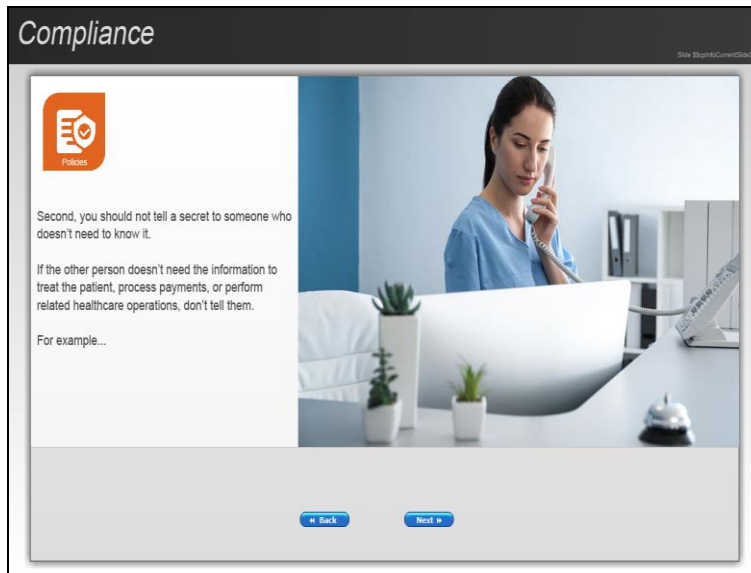
When you are using, accessing, or disclosing PHI related to treatment, payment, or healthcare operations, you are not obligated to obtain the patient's authorization.

9) Image : C:\Users\Pictures\Compliance\Cleared\shutterstock_1393876160sm.png

10) Image : C:\Users\Pictures\Compliance\Cleared\shutterstock_249475018-sm.jpg

- 11) Image : C:\Users\\Pictures\Compliance\Cleared\shutterstock_48545302-sm.png
- 12) Image : C:\Users\\Pictures\Compliance\CC-013 Compliance Icons-02 Policies.png
- 13) Text Caption : Policies

Slide24



Properties:

Display Time	: 10.30sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Button
- 6) Button
- 7) Button
- 8) Text Caption :

Second, you should not tell a secret to someone who doesn't need to know it.



If the other person doesn't need the information to treat the patient, process payments, or perform related healthcare operations, don't tell them.

For example...

- 9) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY21\AdobeStock_249468799-SM.jpeg
- 10) Image : C:\Users\ Pictures\Compliance\CC-013 Compliance Icons-02 Policies.png
- 11) Text Caption : Policies

Slide25

Compliance

Environmental Services colleagues need to know when a patient is being discharged or when they will be out so they can plan when to clean the room.

They do not need to know where the patient is going or why. This would exceed the "minimum necessary" rule.

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Next →

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

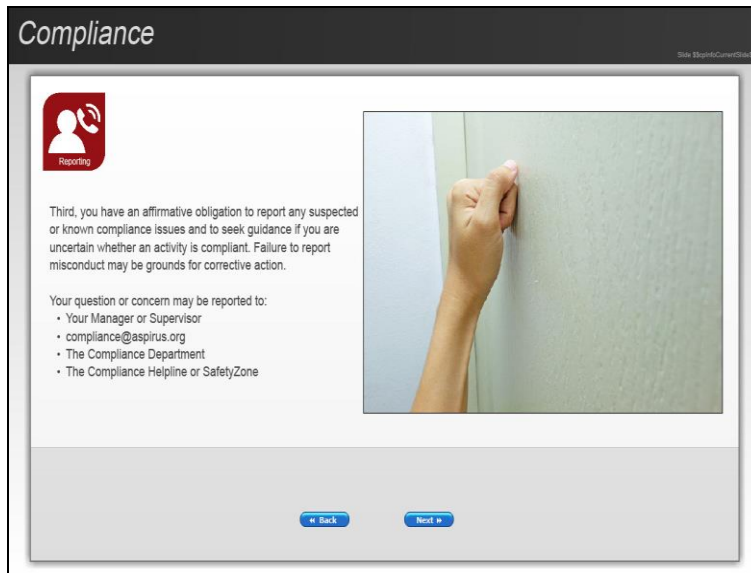
Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Environmental Services colleagues need to know when a patient is being discharged or when they will be out so they can plan when to clean the room.

They do not need to know where the patient is going or why. This would exceed the "minimum necessary" rule.

- 3) Image : S:\JonK\Graphic Request 01\Cleared\shutterstock_214144135-sm.png
- 4) Image : C:\Users\Pictures\Compliance\CC-013 Compliance Icons-02 Policies.png
- 5) Text Caption : Policies

Slide26



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Third, you have an affirmative obligation to report any suspected or known compliance issues and to seek guidance if you are uncertain whether an activity is compliant. Failure to report misconduct may be grounds for corrective action.

Your question or concern may be reported to:

Your Manager or Supervisor

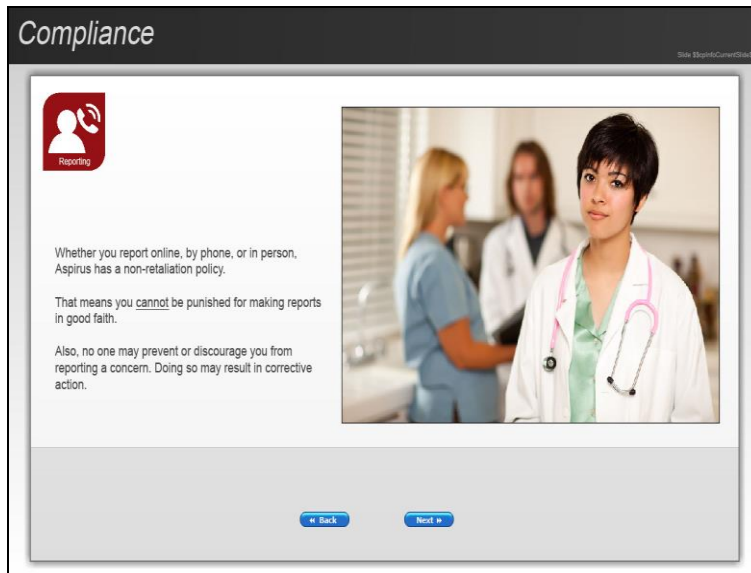
compliance@aspirus.org

The Compliance Department

The Compliance Helpline or SafetyZone

- 3) Image : C:\Users\Pictures\Compliance\Cleared\shutterstock_320476109.png

Slide27



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

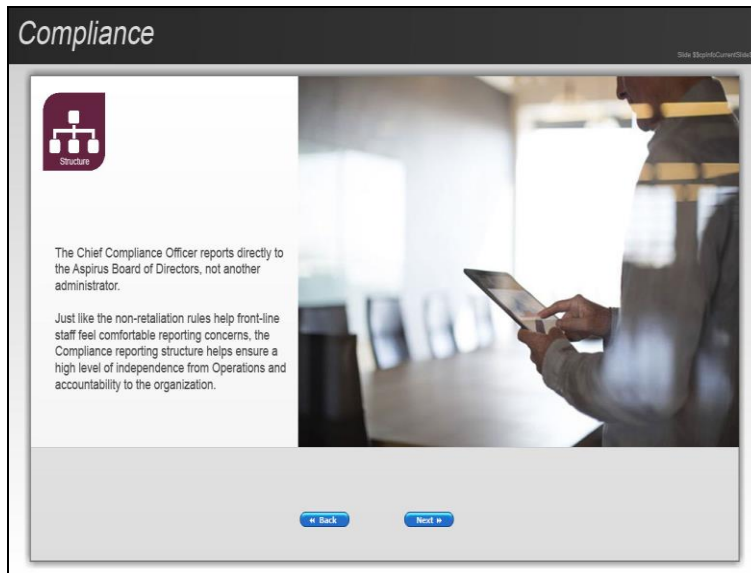
- 1) Text Caption : Compliance
- 2) Text Caption : Whether you report online, by phone, or in person, Aspirus has a non-retaliation policy.

That means you cannot be punished for making reports in good faith.

Also, no one may prevent or discourage you from reporting a concern. Doing so may result in corrective action.

- 3) Image : C:\Users\\Pictures\Compliance\shutterstock_62809756sm.png
- 4) Image : C:\Users\\Pictures\Compliance\CC-013 Compliance Icons-04 Reporting.png
- 5) Text Caption : Reporting

Slide28



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

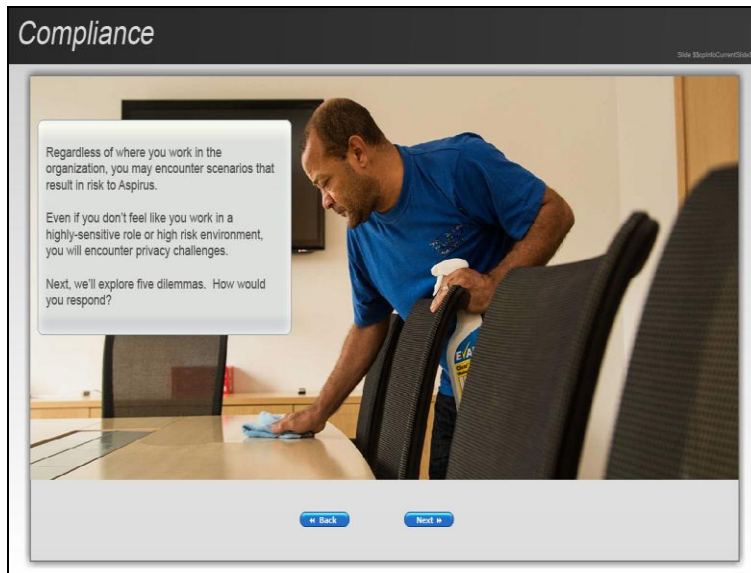
Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : The Chief Compliance Officer reports directly to the Aspirus Board of Directors, not another administrator.

Just like the non-retaliation rules help front-line staff feel comfortable reporting concerns, the Compliance reporting structure helps ensure a high level of independence from Operations and accountability to the organization.

- 3) Text Caption : Reporting
- 4) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\boardrm01.jpg

Slide29



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

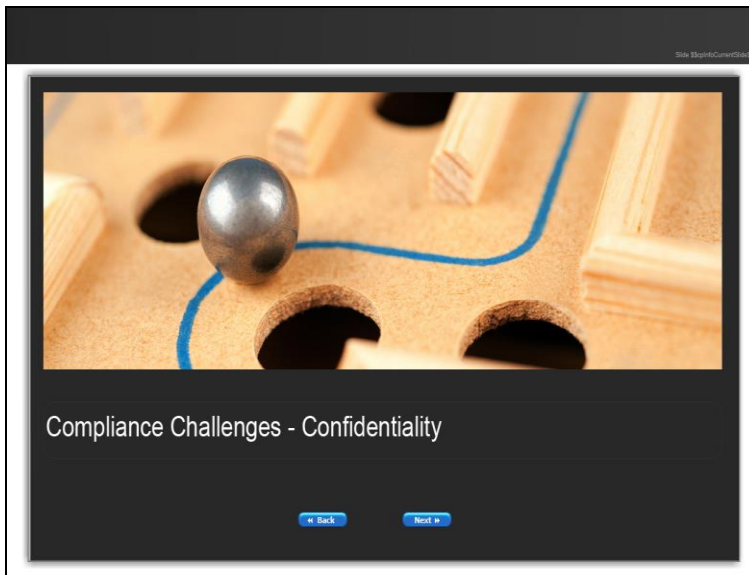
Objects:

- 1) Text Caption : Compliance
- 2) Image : C:\Users\\Pictures\Compliance\office-cleaning-sm.png
- 3) Text Caption : Regardless of where you work in the organization, you may encounter scenarios that result in risk to Aspirus.

Even if you don't feel like you work in a highly-sensitive role or high risk environment, you will encounter privacy challenges.

Next, we'll explore five dilemmas. How would you respond?

Slide30



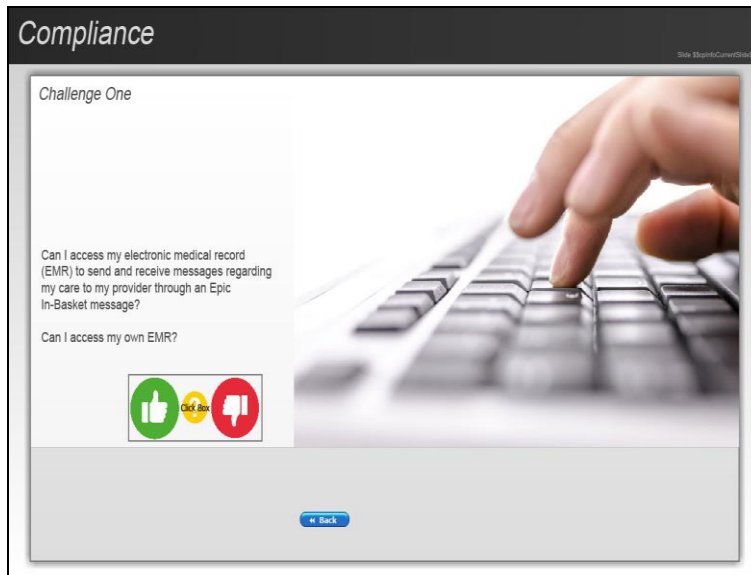
Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Image :
- 2) Button
- 3) Button
- 4) Button
- 5) Button
- 6) Button
- 7) Button

Slide31



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

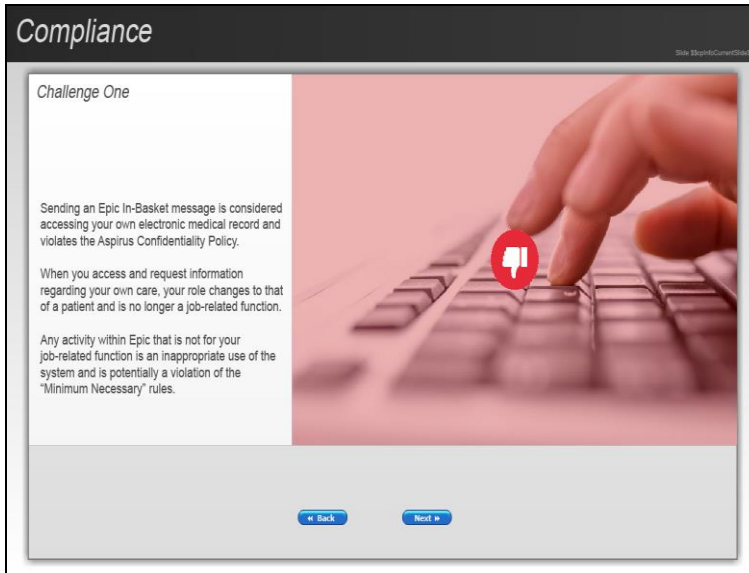
- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : Can I access my electronic medical record (EMR) to send and receive messages regarding my care to my provider through an Epic In-Basket message?

Can I access my own EMR?

6) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_127911035-sm.jpg

7) Text Caption : Challenge One

Slide32



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

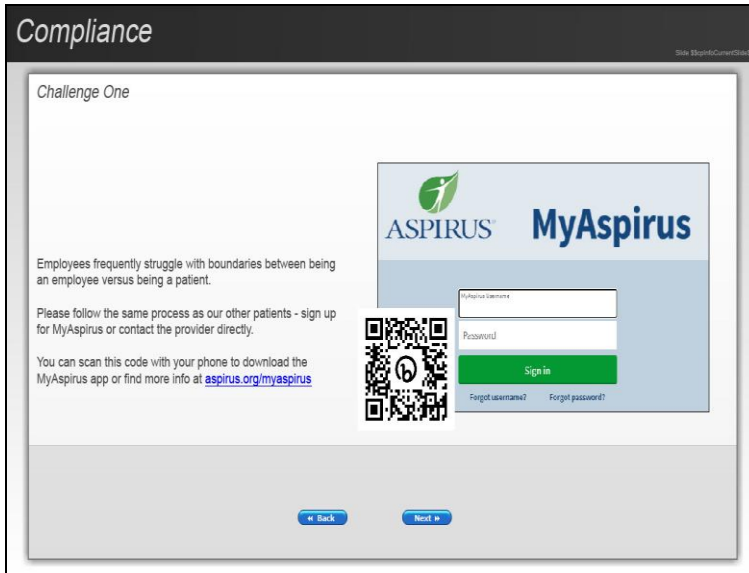
- 1) Text Caption : Compliance
- 2) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_127911035-sm.jpg
- 3) Text Caption : Sending an Epic In-Basket message is considered accessing your own electronic medical record and violates the Aspirus Confidentiality Policy.

When you access and request information regarding your own care, your role changes to that of a patient and is no longer a job-related function.

Any activity within Epic that is not for your job-related function is an inappropriate use of the system and is potentially a violation of the "Minimum Necessary" rules.

- 4) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 5) Text Caption : Challenge One

Slide33



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

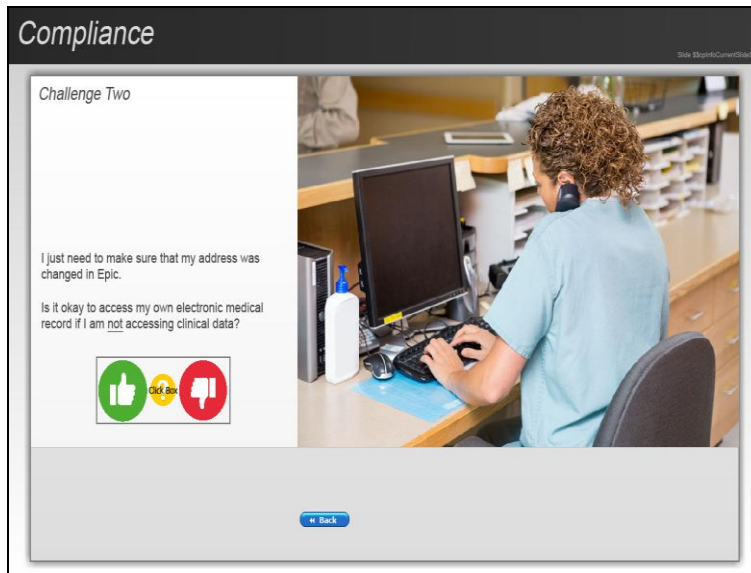
- 1) Text Caption : Compliance
- 2) Text Caption : Employees frequently struggle with boundaries between being an employee versus being a patient.

Please follow the same process as our other patients - sign up for MyAspirus or contact the provider directly.

You can scan this code with your phone to download the MyAspirus app or find more info at aspirus.org/myaspirus

- 3) Text Caption : Challenge One
- 4) Image : C:\Users\...\AppData\Local\Temp\Clipboard91084094843.BMP
- 5) Image : S:\JonK\Course_Reviews\Compliance\my-aspirus-qr-via-compliance-course.png

Slide34



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

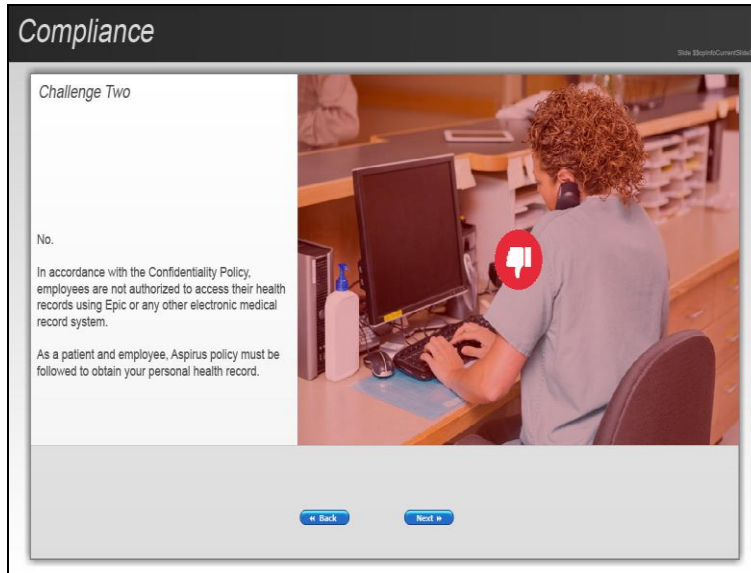
- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : I just need to make sure that my address was changed in Epic.

Is it okay to access my own electronic medical record if I am not accessing clinical data?

- 6) Image : C:\Users\AppData\Local\Temp\Clipboard91085256515.BMP

- 7) Text Caption : Challenge Two

Slide35



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

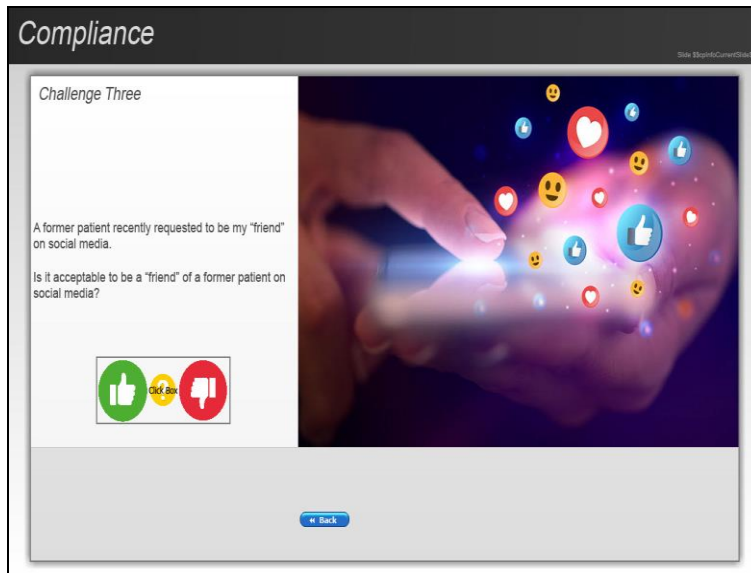
- 1) Text Caption : Compliance
- 2) Image : C:\Users\\AppData\Local\Temp\Clipboard91085256515.BMP
- 3) Text Caption : No.

In accordance with the Confidentiality Policy, employees are not authorized to access their health records using Epic or any other electronic medical record system.

As a patient and employee, Aspirus policy must be followed to obtain your personal health record.

- 4) Image : C:\Users\\Pictures\Stock Images\thumbsdown.png
- 5) Text Caption : Challenge Two

Slide36



Properties:

Display Time	:	3.00sec
Transition	:	No Transition
Navigation	:	No Action
Audio	:	None

Objects:

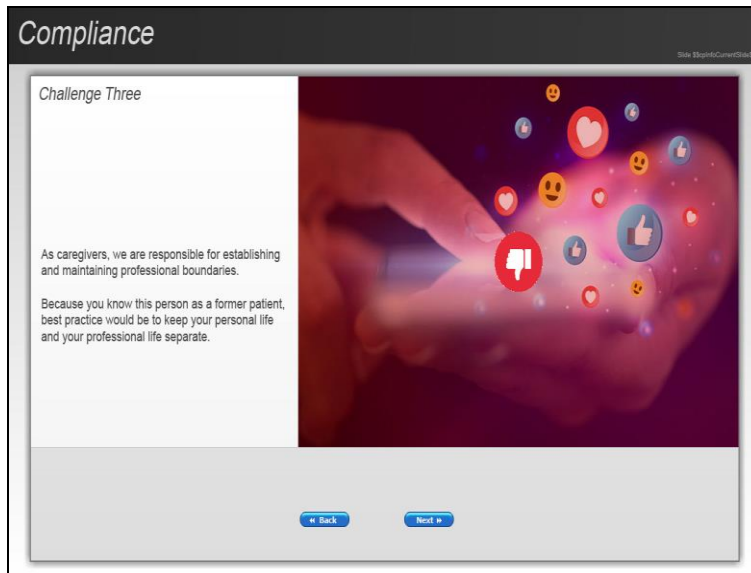
- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : A former patient recently requested to be my "friend" on social media.

Is it acceptable to be a "friend" of a former patient on social media?

- 6) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_293836011_487.jpeg

- 7) Text Caption : Challenge Three

Slide37



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : As caregivers, we are responsible for establishing and maintaining professional boundaries.

Because you know this person as a former patient, best practice would be to keep your personal life and your professional life separate.


- 3) Text Caption : Challenge Three
- 4) Image : C:\Users\Pictures\Stock Images\thumbsdown.png
- 5) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_293836011_487.jpeg
- 6) Image : C:\Users\Pictures\Stock Images\thumbsdown.png

Slide38


Compliance

Challenge Four

Is it okay to access patient lists in another area or department (ex. ED Tracker Board)? I work on another unit and want to see how busy they are right now.



[Back](#)



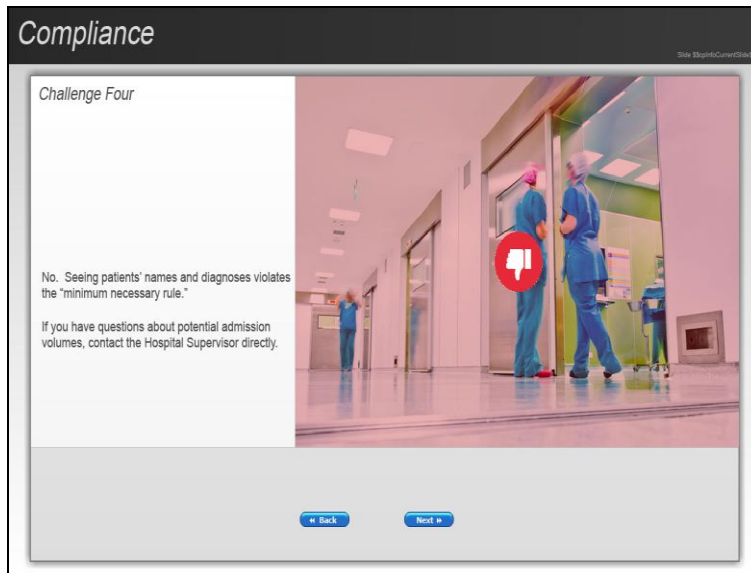
Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : Is it okay to access patient lists in another area or department (ex. ED Tracker Board)? I work on another unit and want to see how busy they are right now.
- 6) Image : C:\Users\AppData\Local\Temp\Clipboard91087001968.BMP
- 7) Text Caption : Challenge Four

Slide39



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Image : C:\Users\AppData\Local\Temp\Clipboard91087001968.BMP
- 3) Text Caption : No. Seeing patients' names and diagnoses violates the "minimum necessary rule."

If you have questions about potential admission volumes, contact the Hospital Supervisor directly.

- 4) Image : C:\Users\Pictures\Stock Images\thumbsdown.png
- 5) Text Caption : Challenge Four

Slide40

Compliance

Challenge Five

A nurse is coming off shift and posts a comment on social media about the heartbreaking outcome of one of their patients. They are careful to leave out the patient's name, location, and other identifiers.

Later, the nurse is alerted of a recent comment from a social media "friend" who could identify the patient by the description of the event. They are upset because the patient was their sibling.

Did the nurse take reasonable measures to safeguard the patient's privacy?

Back

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

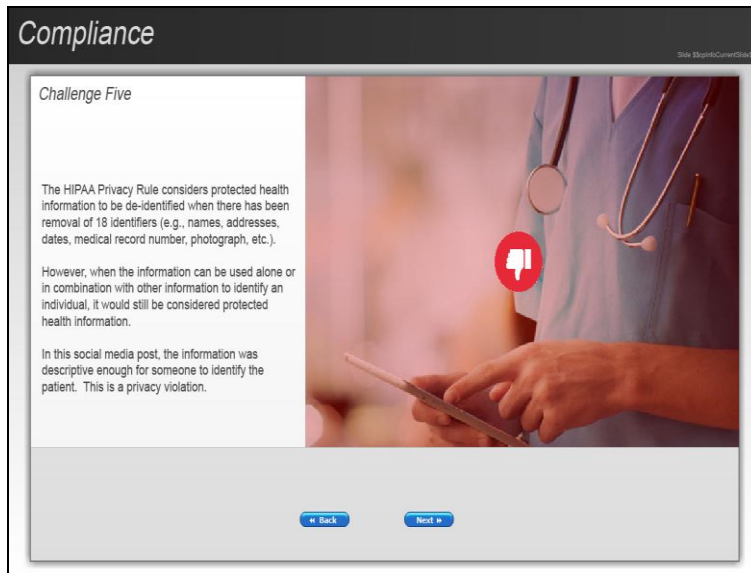
- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : A nurse is coming off shift and posts a comment on social media about the heartbreaking outcome of one of their patients. They are careful to leave out the patient's name, location, and other identifiers.

Later, the nurse is alerted of a recent comment from a social media "friend" who could identify the patient by the description of the event. They are upset because the patient was their sibling.

Did the nurse take reasonable measures to safeguard the patient's privacy?

- 6) Image : C:\Users\\AppData\Local\Temp\Clipboard91087070953.BMP
- 7) Text Caption : Challenge Five

Slide41



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : The HIPAA Privacy Rule considers protected health information to be de-identified when there has been removal of 18 identifiers (e.g., names, addresses, dates, medical record number, photograph, etc.).

However, when the information can be used alone or in combination with other information to identify an individual, it would still be considered protected health information.

In this social media post, the information was descriptive enough for someone to identify the patient. This is a privacy violation.

- 3) Image : C:\Users\AppData\Local\Temp\Clipboard91087070953.BMP
- 4) Image : C:\Users\Pictures\Stock Images\thumbsdown.png
- 5) Text Caption : Challenge Five

Slide42



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Image : O:\Presentations and Programs\Compliance\Images\AdobeStock_141856631-1200.jpg

Slide43


Compliance

Drug Diversion - Definition

Drug Diversion is "intentionally and without proper authorization, using or taking possession of a prescription medication or medical gas from Aspirus supplies, Aspirus patients, or through the use of Aspirus prescription, ordering, or dispensing systems."

Examples of drug diversion include:

- Medication theft
- Using or taking possession of a medication without a valid order or prescription
- Forging or inappropriately modifying a prescription
- Using or taking possession of medication waste, i.e., left over medication
- Inhalation of anesthesia gases



◀ Back Next ▶

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Drug Diversion is "intentionally and without proper authorization, using or taking possession of a prescription medication or medical gas from Aspirus supplies, Aspirus patients, or through the use of Aspirus prescription, ordering, or dispensing systems."

Examples of drug diversion include:

Medication theft

Using or taking possession of a medication without a valid order or prescription

Forging or inappropriately modifying a prescription

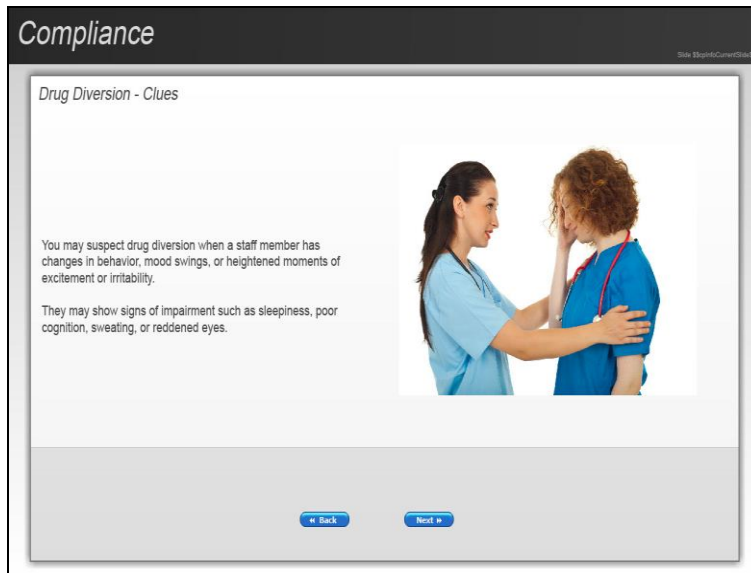
Using or taking possession of medication waste, i.e., left over medication

Inhalation of anesthesia gases

- 3) Text Caption : Drug Diversion - Definition

- 4) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_179884322-1600.jpg

Slide44



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : You may suspect drug diversion when a staff member has changes in behavior, mood swings, or heightened moments of excitement or irritability.

They may show signs of impairment such as sleepiness, poor cognition, sweating, or reddened eyes.

- 3) Text Caption : Drug Diversion - Clues
- 4) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_81713632-sm.jpg


Slide45

Compliance

Drug Diversion - Clues

You may also suspect drug diversion if there are patterns of patients receiving the maximum amount of pain medication outside of their normal usage.

Alternatively, patterns of patient complaints of not getting pain medications or pain medications not working may suggest diversion.



← Back
Next →

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : You may also suspect drug diversion if there are patterns of patients receiving the maximum amount of pain medication outside of their normal usage.
- Alternatively, patterns of patient complaints of not getting pain medications or pain medications not working may suggest diversion.
- 3) Text Caption : Drug Diversion - Clues
- 4) Image : O:\Presentations and Programs\Compliance\Images\AdobeStock_166252249-sm.jpeg


Slide46

Compliance

Drug Diversion - Clues

And there are various other documentation patterns that may suggest drug diversion:

- Medications given without a valid order
- Medications given more than 1 hour after removed from stock
- Waste amounts
- Canceled entries
- Missed documentation
- Pain assessments not documented appropriately
- Discrepancies in medication logs and inventory documentation



◀ Back Next ▶

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : And there are various other documentation patterns that may suggest drug diversion:
 - Medications given without a valid order
 - Medications given more than 1 hour after removed from stock
 - Waste amounts
 - Canceled entries
 - Missed documentation
 - Pain assessments not documented appropriately
 - Discrepancies in medication logs and inventory documentation
- 3) Text Caption : Drug Diversion - Clues
- 4) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_123402496-1600.jpg

Slide47

Compliance


Site: Home\Comer\0613

Drug Diversion - Clues

Employees who administer or who have access to controlled substances are required to review medication discrepancies.

Medication discrepancies should be resolved and documented within 24 hours of discovery.

If a discrepancy is unable to be resolved, a SafetyZone should be entered into the Patient Safety Portal under Medication Events for further investigation.



← Back
Next →

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Employees who administer or who have access to controlled substances are required to review medication discrepancies.

Medication discrepancies should be resolved and documented within 24 hours of discovery.

If a discrepancy is unable to be resolved, a SafetyZone should be entered into the Patient Safety Portal under Medication Events for further investigation.

- 3) Text Caption : Drug Diversion - Clues
- 4) Image : O:\Presentations and Programs\Compliance\Images\AdobeStock_404637191-1600.jpg

Slide48

Compliance


Site: BlankContent0610

Drug Diversion - Clues

Finally, there could be various physical clues, such as:

- Medication packaging or IV bag appears to have been tampered with
- IV medications ending sooner than expected
- Missing medications or missing controlled substance keys

Consider this scenario...



← Back
Next →

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

1) Text Caption : Compliance

2) Text Caption : Finally, there could be various physical clues, such as:

- Medication packaging or IV bag appears to have been tampered with
- IV medications ending sooner than expected
- Missing medications or missing controlled substance keys

Consider this scenario...

3) Text Caption : Drug Diversion - Clues

4) Image : O:\Presentations and Programs\Compliance\Images\2021-02-08_8-30-25-sm-slim.jpg

Slide49

Compliance

Drug Diversion - Scenario

A nursing unit supervisor noticed some questionable nursing documentation for narcotic administration. They did not confront the nurse because this nurse is a top performer and is very well-liked.


A couple weeks later, another staff member reported the nurse to the Compliance Helpline for suspicious behavior in handling pain medications.

The investigation revealed that the supervisor had been aware of suspicious behavior but did not Speak Up.

Should the Supervisor receive corrective action?

Likely Yes Likely Not

← Back



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : A nursing unit supervisor noticed some questionable nursing documentation for narcotic administration. They did not confront the nurse because this nurse is a top performer and is very well-liked.

A couple weeks later, another staff member reported the nurse to the Compliance Helpline for suspicious behavior in handling pain medications.

The investigation revealed that the supervisor had been aware of suspicious behavior but did not Speak Up.

Should the Supervisor receive corrective action?

- 6) Text Caption : Drug Diversion - Scenario
- 7) Image : C:\Users\\Pictures\Compliance2021\AdobeStock_295203287sm.jpeg

Slide50

Compliance


Slide 50 of 86

Drug Diversion - Consequences

Yes.

The staff member was diverting narcotic medications for personal use and was dismissed and reported to the licensing authority.

The supervisor also received corrective action for not Speaking Up when the suspicious behavior was initially observed.



← Back
Next →

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

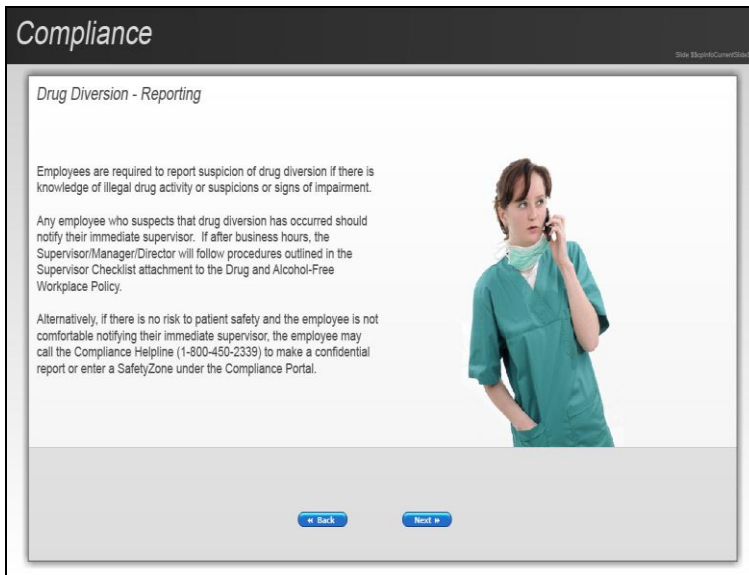
- 1) Text Caption : Compliance
- 2) Text Caption : Yes.

The staff member was diverting narcotic medications for personal use and was dismissed and reported to the licensing authority.

The supervisor also received corrective action for not Speaking Up when the suspicious behavior was initially observed.

- 3) Text Caption : Drug Diversion - Consequences
- 4) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_123402496-1600.jpg

Slide51



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

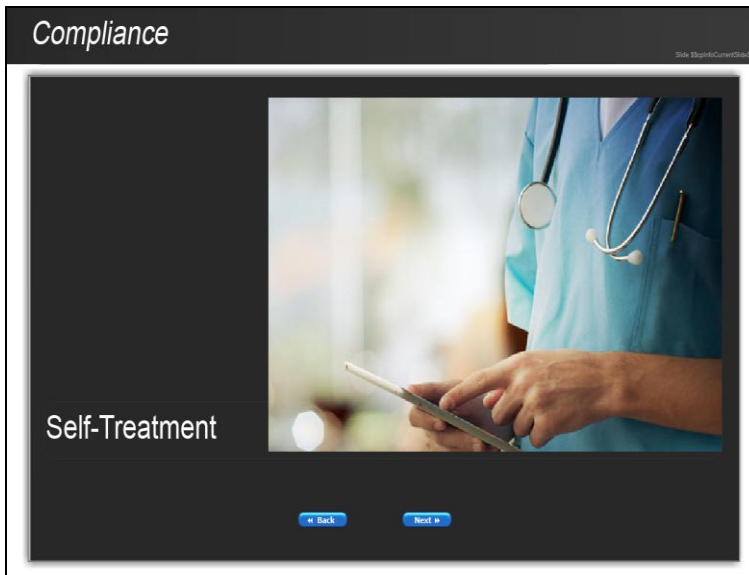
- 1) Text Caption : Compliance
- 2) Text Caption : Employees are required to report suspicion of drug diversion if there is knowledge of illegal drug activity or suspicions or signs of impairment.

Any employee who suspects that drug diversion has occurred should notify their immediate supervisor. If after business hours, the Supervisor/Manager/Director will follow procedures outlined in the Supervisor Checklist attachment to the Drug and Alcohol-Free Workplace Policy.

Alternatively, if there is no risk to patient safety and the employee is not comfortable notifying their immediate supervisor, the employee may call the Compliance Helpline (1-800-450-2339) to make a confidential report or enter a SafetyZone under the Compliance Portal.

- 3) Text Caption : Drug Diversion - Reporting
- 4) Image : C:\Users\ Pictures\Compliance\shutterstock_74629351.png

Slide52



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

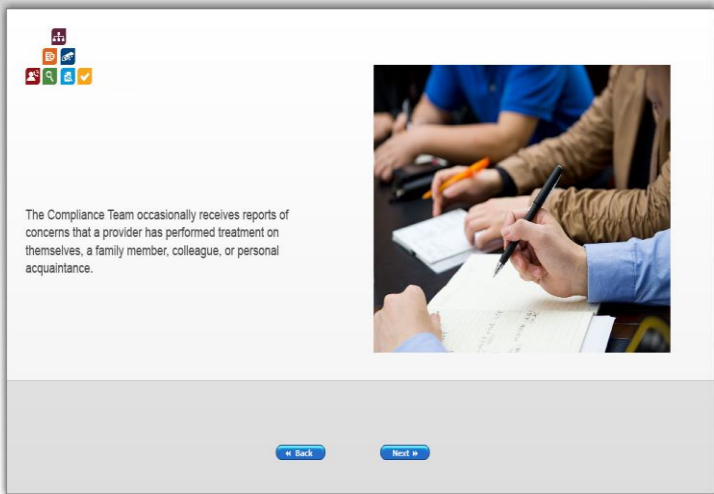
Objects:

- 1) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_276888647-sm.jpg

Slide53

Compliance

Site: Slides\Comer\53.ppt



The Compliance Team occasionally receives reports of concerns that a provider has performed treatment on themselves, a family member, colleague, or personal acquaintance.

« Back Next »

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : The Compliance Team occasionally receives reports of concerns that a provider has performed treatment on themselves, a family member, colleague, or personal acquaintance.
- 3) Text Caption : Reporting
- 4) Text Caption : Education
- 5) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_151052993-1600.jpg

Slide54

The screenshot shows a presentation slide with the following content:

- Title:** Compliance
- Scenario:** Consider this scenario: A pharmacy audit revealed that a physician prescribed a medication to their spouse for a respiratory illness. The medication was dispensed at an Aspirus pharmacy and billed to the spouse's insurance plan.
- Insurance Issue:** The insurance plan recognized the claim was for an immediate family member, so the reimbursement was denied and triggered a request to review the spouse's health record.
- Question:** Should the physician have prescribed a medication for their spouse? What factors should be considered when presented with the option to treat a family member?
- Navigation:** Buttons for "Back" and "Next" are visible at the bottom.

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Consider this scenario:

A pharmacy audit revealed that a physician prescribed a medication to their spouse for a respiratory illness. The medication was dispensed at an Aspirus pharmacy and billed to the spouse's insurance plan.


The insurance plan recognized the claim was for an immediate family member, so the reimbursement was denied and triggered a request to review the spouse's health record.

Should the physician have prescribed a medication for their spouse? What factors should be considered when presented with the option to treat a family member?

- 3) Text Caption : Reporting
- 4) Text Caption : Education
- 5) Image : O:\Presentations and Programs\Compliance\Images\AdobeStock_76427788-1200.jpg

Slide55


Compliance



Professional Organizations' Positions

The American Medical Association (AMA) Code of Ethics states that, generally, physicians should not treat themselves or members of their immediate family because their professional objectivity may be compromised in those situations.

The American College of Physicians (ACP) Ethics Manual agrees and also asks physicians to be very cautious about assuming the care of closely associated employees.



← Back
Next →

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

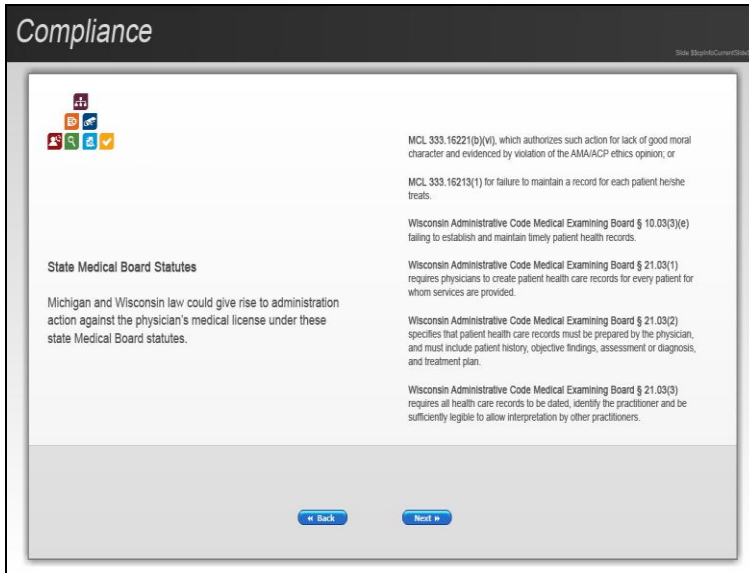
- 1) Text Caption : Compliance
- 2) Text Caption : Professional Organizations' Positions

The American Medical Association (AMA) Code of Ethics states that, generally, physicians should not treat themselves or members of their immediate family because their professional objectivity may be compromised in those situations.

The American College of Physicians (ACP) Ethics Manual agrees and also asks physicians to be very cautious about assuming the care of closely associated employees.

- 3) Text Caption : Reporting
- 4) Text Caption : Education
- 5) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_124145977-1600.jpg

Slide56



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : State Medical Board Statutes

Michigan and Wisconsin law could give rise to administration action against the physician's medical license under these state Medical Board statutes.

- 3) Text Caption : Reporting
- 4) Text Caption : Education
- 5) Text Caption : MCL 333.16221(b)(vi), which authorizes such action for lack of good moral character and evidenced by violation of the AMA/ACP ethics opinion; or

MCL 333.16213(1) for failure to maintain a record for each patient he/she treats.

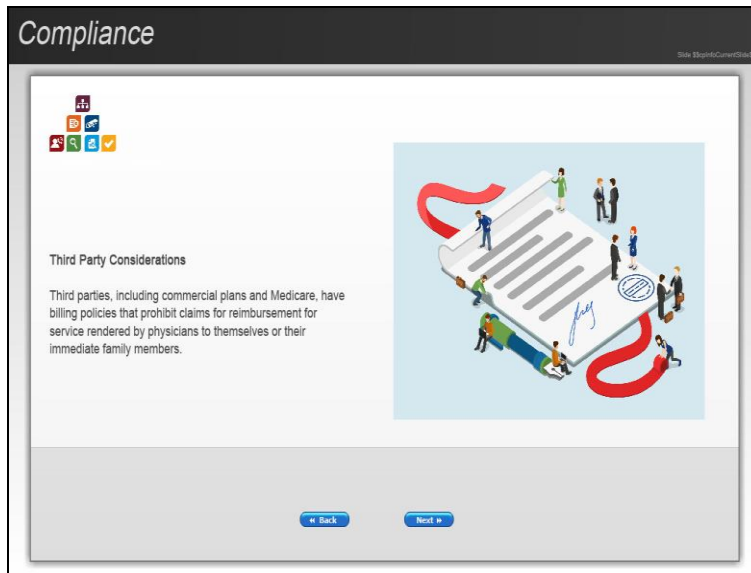
Wisconsin Administrative Code Medical Examining Board § 10.03(3)(e) failing to establish and maintain timely patient health records.

Wisconsin Administrative Code Medical Examining Board § 21.03(1) requires physicians to create patient health care records for every patient for whom services are provided.

Wisconsin Administrative Code Medical Examining Board § 21.03(2) specifies that patient health care records must be prepared by the physician, and must include patient history, objective findings, assessment or diagnosis, and treatment plan.

Wisconsin Administrative Code Medical Examining Board § 21.03(3) requires all health care records to be dated, identify the practitioner and be sufficiently legible to allow interpretation by other practitioners.

Slide57



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

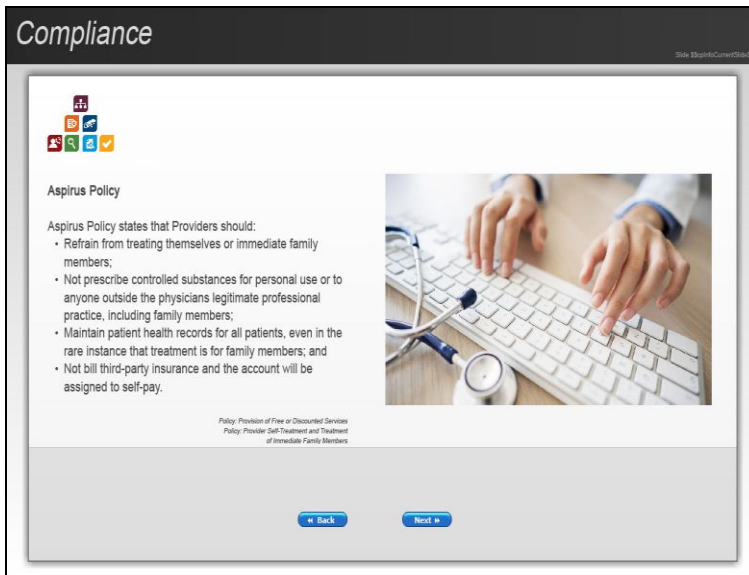
Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Third Party Considerations

Third parties, including commercial plans and Medicare, have billing policies that prohibit claims for reimbursement for service rendered by physicians to themselves or their immediate family members.

- 3) Text Caption : Reporting
- 4) Text Caption : Education
- 5) Image : O:\Presentations and Programs\Compliance\Images\shutterstock_248941885-1600.jpg

Slide58



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Aspirus Policy

Aspirus Policy states that Providers should:

- Refrain from treating themselves or immediate family members;
- Not prescribe controlled substances for personal use or to anyone outside the physicians legitimate professional practice, including family members;
- Maintain patient health records for all patients, even in the rare instance that treatment is for family members; and
- Not bill third-party insurance and the account will be assigned to self-pay.

Policy: Provision of Free or Discounted Services

Policy: Provider Self-Treatment and Treatment of Immediate Family Members

- 3) Text Caption : Reporting
- 4) Text Caption : Education
- 5) Image : O:\Presentations and Programs\Compliance\Images\AdobeStock_217329480-1200.jpg

Slide59



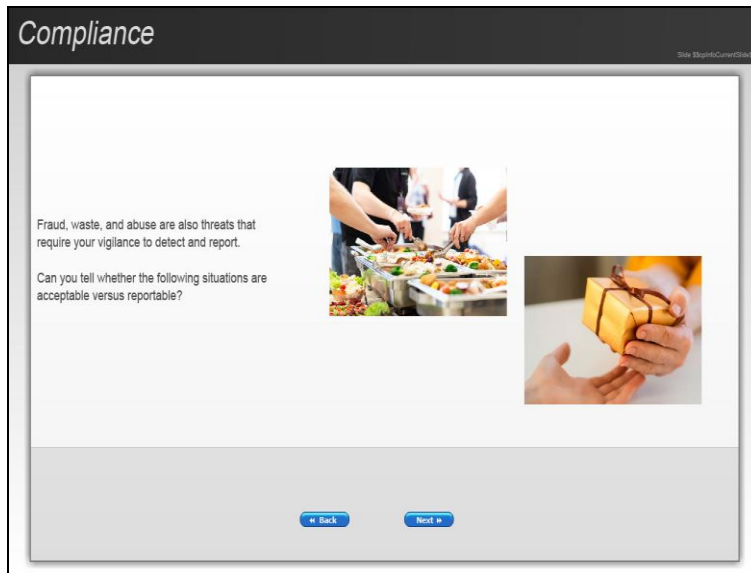
Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Image : S:\JonK\Graphic Request 01\Cleared\shutterstock_206712397sm.jpg

Slide60



Properties:

Display Time	: 9.80sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Fraud, waste, and abuse are also threats that require your vigilance to detect and report.

Can you tell whether the following situations are acceptable versus reportable?

- 3) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_278732917-487.jpeg
- 4) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_576802856-487.jpeg

Slide61



Properties:

Display Time	: 9.80sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : A pharmaceutical representative brings catered lunch to the clinic multiple times per week.

Is this okay?

- 6) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_278732917-487.jpeg
- 7) Text Caption : Challenge One

Slide62


Compliance Slide 62 of 62

Challenge One

This could likely be a violation of the Anti-kickback Statute:

Asking for or receiving anything of value in exchange for referrals of Federal health care program business is a crime unless an exception to the law is met

Even though the clinic staff are not asking for lunch, they are receiving something of value several times a week, which could influence their ability to make impartial decisions.



← Back
Next →

Properties:

Display Time	: 9.80sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : This could likely be a violation of the Anti-kickback Statute:

Asking for or receiving anything of value in exchange for referrals of Federal health care program business is a crime unless an exception to the law is met

Even though the clinic staff are not asking for lunch, they are receiving something of value several times a week, which could influence their ability to make impartial decisions.

3) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_278732917-487.jpeg

4) Image : C:\Users\...\Pictures\Stock Images\thumbsdown.png

5) Text Caption : Challenge One

Slide63

The screenshot shows a presentation slide with the following content:

- Slide Title:** Compliance
- Section:** Challenge One
- Main Text:** The Solicitation & Acceptance of Gifts Policy and the Medical Device/Pharmaceutical/Vendor Sales Representative Policy prohibit vendors from offering meals, gifts, and medication samples.
- Document 1:** Solicitation and Acceptance of Gifts (Gifting) Policy (System Wide)
 - PURPOSE:** To provide guidance regarding the... vendors, related recipients, and...
 - SCOPE (STAKE):** Directors, officers, employees, and...
 - PROVISIONS:**
 1. **Basic Rule:** Solicitation, requests, or payments generally... an expectation contained in their... recipients, or payments must be well... entertainment offered to:
- Document 2:** Aspius Medical Device/Pharmaceutical/Vendor Sales Representative Policy (System)
 - PURPOSE:** Monitor and control Vendor Sales Representative access and conducting at all Aspius facilities...
 - The policy shall include:**
 1. Requirements to monitor and control Vendor Sales Representative access at all Aspius...
 2. Standards for efficient and safe interactions between our Vendor community and our Aspius...
 3. Definitions for ownership and accountability related to managing Vendor access to Aspius...
 4. Clear guidelines for the use of the Vendor Credentialing System at Aspius...
 - Additional Text:** The inconsistent application of Vendor management processes across Aspius facilities can lead to possible liability concerns, compliance integrity, and fairness issues. Healthcare industry accounting organizations require standard of care and adherence to the guidelines for management and all facilities include manage direct employees, including verification of all relevant human resource information. Further, such accounting organizations through their standards require accredited facilities to manage safety and security risks, including the identification, appearance, and prevention of all prohibited staff and other people at the facility.

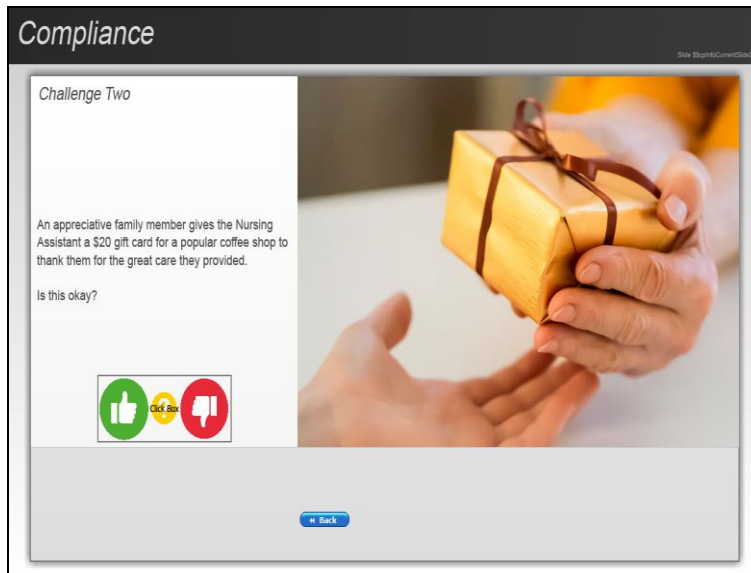
Properties:

Display Time	: 9.80sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : The Solicitation & Acceptance of Gifts Policy and the Medical Device/Pharmaceutical/Vendor Sales Representative Policy prohibit vendors from offering meals, gifts, and medication samples.
- 3) Text Caption : Challenge One
- 4) Image : C:\Users\\Pictures\sol pol.png
- 5) Image : C:\Users\\Pictures\vendor pol.png

Slide64



Properties:

Display Time	: 9.80sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : An appreciative family member gives the Nursing Assistant a \$20 gift card for a popular coffee shop to thank them for the great care they provided.

Is this okay?

- 6) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_576802856-487.jpeg
- 7) Text Caption : Challenge Two


Slide65

Compliance

Challenge Two

Gifts that are perishable and of minimal value given to a group are okay - for example, bakery or flowers that can be enjoyed by everyone.

But gifts to specific individuals are not allowed; they can represent an expectation of preferential treatment now or in future encounters.



◀ Back Next ▶

Properties:

Display Time	: 9.80sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

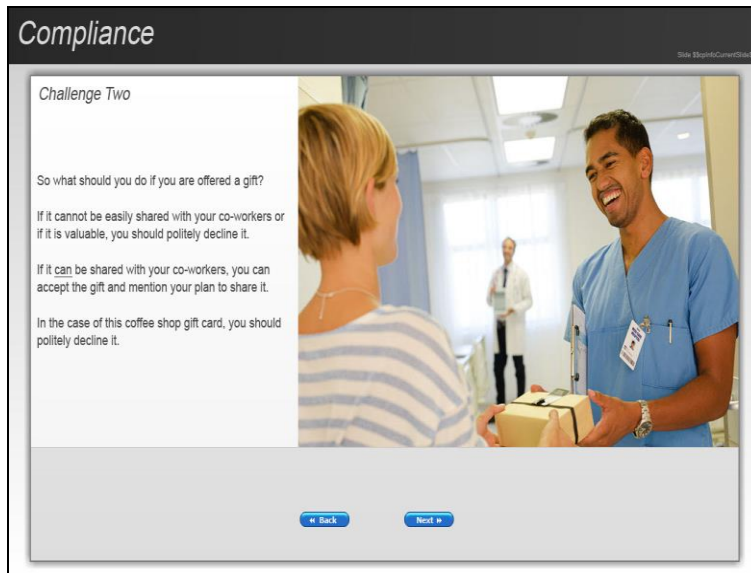
Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Gifts that are perishable and of minimal value given to a group are okay - for example, bakery or flowers that can be enjoyed by everyone.

But gifts to specific individuals are not allowed; they can represent an expectation of preferential treatment now or in future encounters.

- 3) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_576802856-487.jpeg
- 4) Image : C:\Users\ Pictures\Stock Images\question.png
- 5) Text Caption : Challenge Two

Slide66



Properties:

Display Time	: 9.80sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : So what should you do if you are offered a gift?

If it cannot be easily shared with your co-workers or if it is valuable, you should politely decline it.

If it can be shared with your co-workers, you can accept the gift and mention your plan to share it.

In the case of this coffee shop gift card, you should politely decline it.

- 3) Image : Y:\EDSERV\Instructional Design\Stock Images\Compliance2021\FY24\AdobeStock_453926010-487.jpeg

- 4) Text Caption : Challenge Two


Slide67

Compliance

Challenge Three

Jane Smith is an employed Nurse Practitioner in the Family Medicine Clinic. The State Board of Nursing notified her that her nursing license will expire in 90 days (February 28). Jane ignored this reminder, as well as subsequent reminders from the Board and from her employer, who also monitors licensure.

On March 5, the State Board of Nursing notified Jane that her license was not renewed and has expired. Jane worked March 1, 2, and 3 in the clinic and is scheduled to work tomorrow. She panics and notifies the Clinic Manager. What should the Clinic Manager do?



Notify the Compliance Dept

Ask Jane to Renew ASAP

Back

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Button
- 3) Button
- 4) Button
- 5) Text Caption : Jane Smith is an employed Nurse Practitioner in the Family Medicine Clinic. The State Board of Nursing notified her that her nursing license will expire in 90 days (February 28). Jane ignored this reminder, as well as subsequent reminders from the Board and from her employer, who also monitors licensure.
- On March 5, the State Board of Nursing notified Jane that her license was not renewed and has expired. Jane worked March 1, 2, and 3 in the clinic and is scheduled to work tomorrow. She panics and notifies the Clinic Manager. What should the Clinic Manager do?
- 6) Image : C:\Users\ Pictures\Compliance2021\AdobeStock_249468799-SM.jpeg
- 7) Text Caption : Challenge Three

Slide68

Compliance


Slide Board/Content/Slide8

Challenge Three

Both. The Clinic Manager should immediately notify Human Resources and the Compliance Department that Jane has worked three days under her still-expired license.

Jane must immediately resolve her expired license with the State Board of Nursing and cannot work in the clinic in the meantime.

Any services provided by an unlicensed professional cannot be billed and any reimbursement received for these services must be returned to the payors. Human Resource would follow the Corrective Action Policy and ensure Jane understands her accountability for maintaining her license.



← Back
Next →

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

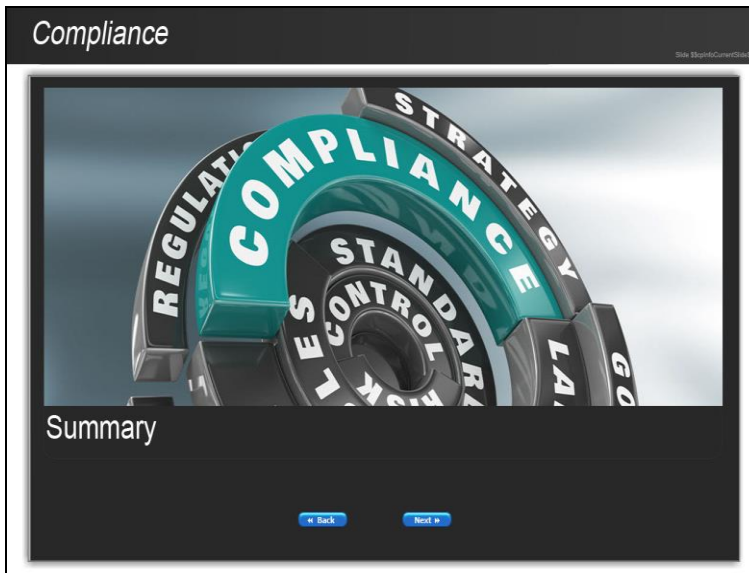
- 1) Text Caption : Compliance
- 2) Text Caption : Both. The Clinic Manager should immediately notify Human Resources and the Compliance Department that Jane has worked three days under her still-expired license.

Jane must immediately resolve her expired license with the State Board of Nursing and cannot work in the clinic in the meantime.

Any services provided by an unlicensed professional cannot be billed and any reimbursement received for these services must be returned to the payors. Human Resource would follow the Corrective Action Policy and ensure Jane understands her accountability for maintaining her license.

- 3) Image : C:\Users\ Pictures\Compliance2021\shutterstock_249475018-sm.jpg
- 4) Text Caption : Challenge Three

Slide69



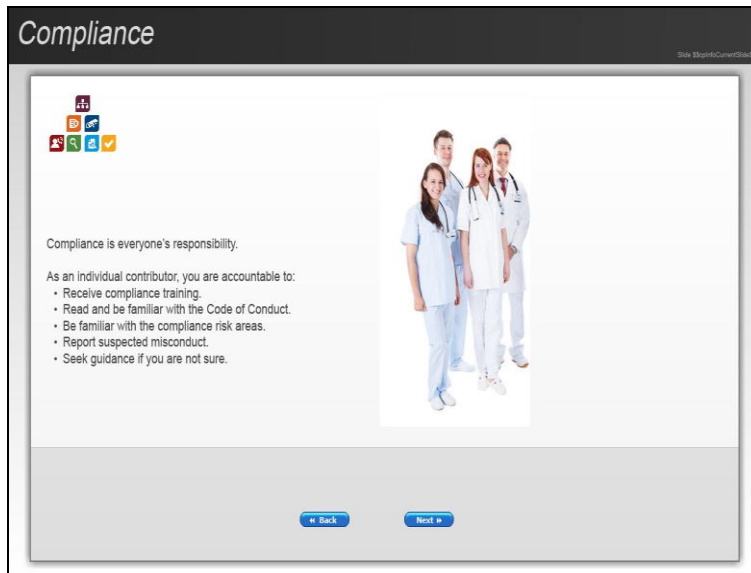
Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

1) Image : S:\JonK\Graphic Request 01\Cleared\shutterstock_206712397sm.jpg

Slide70



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Compliance is everyone's responsibility.

As an individual contributor, you are accountable to:

Receive compliance training.

Read and be familiar with the Code of Conduct.

Be familiar with the compliance risk areas.

Report suspected misconduct.

Seek guidance if you are not sure.

- 3) Image : S:\JonK\Graphic Request 01\Cleared\shutterstock_183253955sm-crop.jpg

Slide71



Properties:

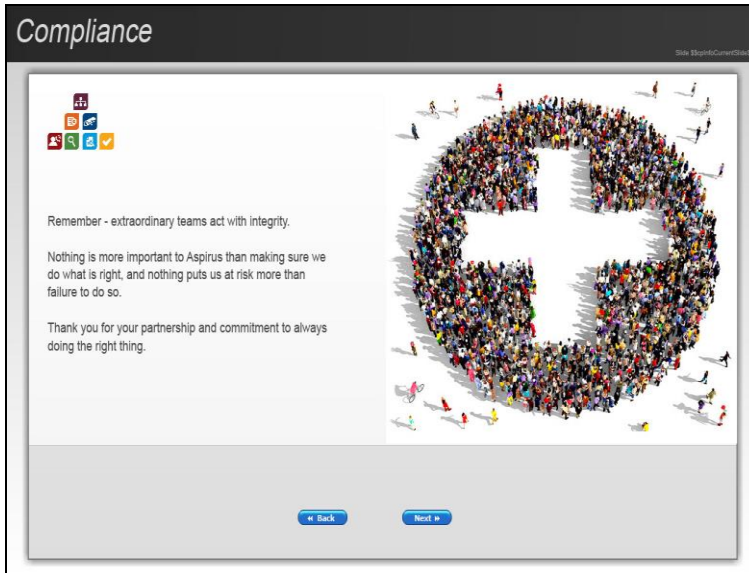
Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : As a Supervisor or Manager, you are expected to:
Lead by example.
Encourage employees to ask questions and report concerns.
Consider compliance when evaluating and rewarding employees.
Be familiar with compliance risk areas and create risk mitigation steps.
Prevent, detect, and respond to compliance issues.

- 3) Image : S:\JonK\Graphic Request 01\Cleared\shutterstock_183253955sm.jpg

Slide72



Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Remember - extraordinary teams act with integrity.

Nothing is more important to Aspirus than making sure we do what is right, and nothing puts us at risk more than failure to do so.

Thank you for your partnership and commitment to always doing the right thing.

- 3) Image : C:\Users\\Pictures\Compliance\shutterstock_246782848sm.jpg

Slide73

Compliance

Site:18040/Content/36/33

Thank you so much for participating in this training.

Questions on the content of this training? Please contact compliance@aspirus.org
 Questions on the functionality of this training? Please contact [Organizational Learning & Development](#)

Structure
 Policies Education
 Reporting Investigation Auditing Corrective Action

Back Continue

Properties:

Display Time	: 3.00sec
Transition	: No Transition
Navigation	: No Action
Audio	: None

Objects:

- 1) Text Caption : Compliance
- 2) Text Caption : Thank you so much for participating in this training.

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