

## Compliance: Partnering with our Medical Staff

In addition to our Mission, Vision and Values, the policies outlined in this guide help ensure that the decisions and actions of our medical staff meet legal, ethical, and professional obligations. If you have questions about this, please contact your Medical Staff Office or one of the resources listed in this guide. You may also refer to the [Providence Code of Conduct](#).



### Fraud and Abuse Laws

Providence's [Fraud, Waste and Abuse Prevention Policy \(PSJH-RIS-711\)](#) requires that claims contain true, complete, and accurate information. Individuals who report concerns are protected from retaliation under our [Non-Retaliation Policy \(PSJH-RIS-733\)](#) and federal & state whistleblower laws.

### Stark and Anti-Kickback Laws

Federal & state anti-kickback statutes and the federal Stark Law apply among Providence hospitals, other entities, and physicians. Providence physicians and other referral sources may not accept any inducement for a patient referral.

### Conflicts of Interest (COI)

A Conflict of Interest occurs when personal interests or activities influence or **appear to influence** actions and decisions. If you believe a possible conflict of interest may exist, then treat the situation as if a conflict does exist & disclose it.

#### Physician Payments Sunshine Act

- The Sunshine Act, known as the "Open Payments Program," was created to ensure transparency in financial relationships between physicians and pharmaceutical and medical device industries.
- You may access the CMS database to see what has been reported about you.

#### Physician-Owned Vendors (POVs)

- Arrangements with POVs for the purchase of items and services are generally prohibited by Providence's Purchases from Physician-Owned Intermediaries Distributors policy (PROV-ICP-723) due to the potential for improper inducement or referrals.

#### Protected Health Information (PHI) & Security

- PHI should only be accessed when there is a legitimate business need.
- A patient's PHI should not be discussed in public areas.
- PHI should never be posted on social media sites.
- Passwords should never be shared.

#### Accessing Your Medical Record

- Providence policy prohibits anyone, including physicians, from accessing their own medical record and requires that you follow standard patient access procedures.

### Excluded Providers

As a recipient of federal funds such as Medicare, we are prohibited from submitting any claim for services ordered, prescribed, or provided by individuals or organizations excluded from participation in federal or state health care programs.

### Medical Identity Theft

If you are treating a patient & suspect medical identity theft for any reason, please immediately report the concern using your entity's identified process or by contacting one of the resources listed in this guide.

### Respectful Work Environment

In keeping with the Providence core values of respect & compassion & to maintain a respectful work environment for all, you should expect to be treated with respect. If you witness such behavior contrary to this, please report it immediately.

### Ethical and Religious Directives

For those Providence locations that are Catholic-based facilities, adherence to all Ethical & Religious Directives are a condition of medical privileges and employment. To learn more, visit [Ethical and Religious Directives](#).

### Reporting Process

For privacy and compliance concerns, you may report by:

- Contacting the Providence Integrity Hotline at:
  - 888-294-8455 (toll free, 24/7)
  - <http://www.integrityonline.ethicspoint.com/>
  - Scan the QR Code with your phone's camera
- Contacting your local or regional compliance office or medical group compliance representative
- Using the identified process in your Medical Staff Office



For quality or patient safety concerns, you may report by:

- [Submitting an event via the High Reliability Platform \(HRP\)](#)

Providence expects medical staff members to promptly report any suspected violations or concerns.



**Did you know?** For more information about Compliance services, including examples, contact information and more, you can visit the [Providence Compliance SharePoint page](#)