Welcome to Avita Health System’s newsletter dedicated to sharing information about corporate compliance, ethics and the HIPAA privacy rule.

This newsletter is published every other month and is intended to expand your knowledge of compliance/ethics and privacy issues so they are always on your mind.

The Office of the Inspector General (OIG) oversees corporate compliance. It seeks to ensure that a corporation’s operations follow the highest standards. OIG recommends several ways for hospitals to have effective compliance plans. Hospitals can do this with education, training, and internal audits.

The Office for Civil Rights oversees the Privacy Rule, which is part of HIPAA (Health Insurance Portability and Accountability Act). Patients deserve their privacy, whether they are a hospital employee, a best friend, or a celebrity.

If you have a question or would like to report a compliance/ethics or privacy issue, call the Compliance Hotline at extension 5614 or 65614. You may also visit me in private on the 2nd Floor at Avita Ontario Hospital or email me at ckropka@avitahs.org.

-Cinda M. Kropka
Compliance/Ethics & Privacy Director

You won’t get in trouble for reporting compliance/ethics or privacy issues in good faith!

Report any such issues immediately upon discovery.

FOCUS—ANTI-KICKBACK, GIFTS, GRATUITIES, BUSINESS COURTESIES

The federal anti-kickback statute prohibits the acceptance of any item of value made to you directly or indirectly, in cash or otherwise, that could persuade or appear to persuade you to buy or refer any kind of health care goods, services, or items reimbursed by a federal or state health care program (Medicare and Medicaid). If you accept significant gifts or business courtesies from people Avita does business with, that could violate federal or state law and you could be fined up to $25,000 and/or receive 5 years in prison for a felony!

A new Avita policy will be available soon on Ellucid that will guide you to make the appropriate decisions when you are offered gifts, gratuities, business courtesies, etc.

Bottom line:

♦ Gifts that are intended to influence you or that may be considered by an objective observer to have the potential to influence you as you are performing your duties or responsibilities at Avita are prohibited.

♦ Gifts of cash or cash equivalents are never allowed. Cash equivalents are investments, securities, etc. that can be converted into cash.
♦ It is acceptable for a department or clinical practice to accept modest, perishable gifts such as floral arrangements, box of cookies, candy or similar food items that will be shared by staff members.

♦ The underwriting of the cost of continuing education conferences or professional meetings that contribute to improvement of patient care are permissible.

♦ Promotional items such as pens, notepads, mugs, etc. may be accepted as long as each are $10 or less, and you receive no more than $50 in total for the year from that particular vendor.

♦ The Marketing Department may develop promotional items of small value (pens, notepads, etc.) that promote awareness of Avita programs, etc.

♦ Meals or other invitations offered to you must be reasonable (not to exceed $100/person) and should not be extravagant.

♦ Sponsors of Avita’s fundraising events may offer event tickets to the Foundation, who will determine who is to receive the sponsored tickets.

♦ Attendance at other nonprofit events is acceptable, as long as it is reasonable, directly supports the nonprofit organization, and the host is present.

♦ When accepting a business courtesy from a referral source, it must be reasonable and should be of limited value ($100 annually), such as modest meals or socializing opportunities held as part of a conference or meeting.

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♦ No gifts or items of any kind should be solicited from patients or their families.

♦ You may not offer food, beverages, gifts or entertainment to government officials.

♦ Business courtesies of personal benefit, such as a pair of tickets to a sporting event or golf outing may not be accepted if the host doesn’t go with you.

♦ Travel expense reimbursement by a vendor is unacceptable when it is extended to your family member, the host is not present at the function, the primary focus is social with minimal or no business activity, is offered to discuss or showcase the vendor’s products (not defined in existing vendor contract), or the event location is extravagant (outside of the USA).

♦ Acceptance of educational support must never be made on condition of a future business relationship.

If you are invited to speak or provide consultation services, you can accept reimbursement for time and expenses if:

♦ Travel, lodging and meal expense is reasonable and directly related to the event.

♦ Compensation fees are of fair market value.

♦ Consultation agreement is in writing.

♦ Non-physician employees receive prior approval from appropriate VP.

♦ Presentation is of scientific/academic merit and/or benefits Avita.

♦ If you are consulting with a vendor who conducts business with Avita, or who wants to conduct business with Avita, first obtain approval from appropriate VP. VP’s should receive approval from the President/CEO.

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Don’t be Defiant!

Stay Compliant!

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THINK!

Congratulations to __________, the winner from July’s newsletter question!

A vendor from a competing company of the one you do business with gives you two free tickets to Game 1 of the World Series (Go Indians!). You may take whomever you want; he isn’t attending.

_Thumbs Up? Thumbs Down?

Email or bubble me with your answer and be entered into a drawing for a $25 gift certificate from Bucyrus or Galion Hospitals’ Gift Shops!