

General Compliance Training



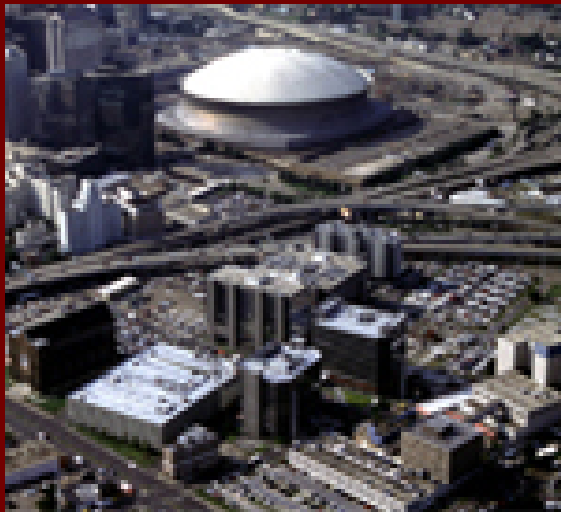
Objectives

- ❖ Introduction to Office of Compliance Program (OCP) staff
- ❖ Improve Compliance Awareness
- ❖ Debarred and Sanctioned individuals
- ❖ Chancellor's Memorandum (CM)-57
- ❖ Permanent Memorandum (PM)-11

Compliance Staff

- ❖ Roy Clay, Compliance Officer
- ❖ Leigh Lamonica, Privacy Officer
- ❖ Harold Borel, Compliance Internal Auditor
- ❖ Lori Ferro, Compliance Internal Auditor
- ❖ Kelly Guth, Compliance Educator
- ❖ Nona Bernard, Research Analyst

Compliance is. . .



A "voluntary" undertaking by an entity or Health Care Provider to assure compliance with governing laws (including Medicare and Medicaid laws)

History of The OCP at LSUHSC-NO

- ❖ Dec. 1998- resolution by LSU Board of Supervisors requiring all medical campuses to have compliance programs in place. Individual LSUHSC-NO schools name compliance officers
- ❖ 2001- Report by ad hoc committee recommends establishment of central compliance office. OCP was created
- ❖ 2002-Reorganization moves OCP under the Vice Chancellor for Administration and Finance

Compliance Program Elements

- ❖ Code of Conduct
- ❖ Designation of a specific person or persons responsible for oversight of the compliance program (compliance officer)
- ❖ Regular Training
- ❖ Anonymous Compliance Hotline

Elements (cont.)

- ❖ Clearly Defined Roles and Responsibilities
- ❖ Audits
- ❖ Policies and Procedures
- ❖ Sanctions for Violators

Consequences of Non-Compliance

- ❖ Fines and penalties (including imprisonment)
- ❖ Additional oversight/monitoring by the government
- ❖ Potential reduction or elimination of Federal funding
- ❖ Adverse publicity and loss of confidence of the community we serve
- ❖ Suspension, debarment, exclusion of individuals or the institution as a whole





Compliance Hotline

For privacy breaches, employee wrongdoing, noncompliance with any federal or state laws, or University policy you can:

❖ Call:

(504) 568-2347 (anonymous hotline)

or

❖ E-mail:

nocompliancehotline@lsuhsc.edu

❖ All reports will be treated with the strictest confidentiality in accordance with Federal regulations and LSUHSC-NO whistleblower policy (CM-53E)

Debarment And Sanctioned Individuals

- ❖ Prevents companies and individuals who have violated Federal laws and regulations from participation in government contracts, subcontractors, loans, grants, and other assistance programs
- ❖ Protects LSUHSC-NO from doing business with an individual/company that pose a business risk

Debarment And Sanctioned Individuals (cont.)

- ❖ A debarment of an individual or entity will result in no federally funded payments for anything an excluded person or entity furnishes, orders, or prescribes regardless of who submits the claims.
- ❖ Excluded entities or individuals must apply for reinstatement before they can participate in any Federal programs.

Actions That Lead To Exclusions

- ❖ Claims for excessive charges or services
- ❖ Obstruction of an investigation
- ❖ Failure to disclose required information
- ❖ Failure to take corrective action
- ❖ Loss or Expiration of License
- ❖ Failure to Repay Student Loans
 - ❖ For a complete list of excluded individuals/entities, go to <http://www.oig.hhs.gov/>

Chancellor's Memorandum (CM)-57

- ❖ Establishes a policy and procedure for the Recoupment of Overpayments made to employees in error. (i.e., leave paid in error, erroneous refunds or deductions etc.)
- ❖ LSU offers several options to recoup overpayments:
 - ❖ Direct deposit reversal
 - ❖ One-time deduction from a subsequent paycheck

CM-57 (cont.)

- ❖ Payment plan for a period not to exceed twelve (12) months
- ❖ Personal payment from employees
- ❖ What Can I do if I disagree with LSU's overpayment claim?
 - ❖ File an appeal with HRM
 - ❖ must be sent less than 14 days from the date of notification
 - ❖ Must explain in writing why a recoupment is not warranted

Permanent Memorandum (PM)-11

- ❖ Establishes policies and procedures for LSU employees requiring any outside employment be disclosed and submitted for administrative review and approval
 - ❖ Applies to all full-time LSU employees including faculty, unclassified and classified employees

Outside Employment

- ❖ Any non-University activity for which economic benefit is received, including but not limited to:
 - ❖ Employment with a non-University employer
 - ❖ Contract to provide consulting, personal or professional services to non-University individuals or entities
 - ❖ Self-employment or operation of a business

Outside Employment (cont.)

- ❖ Economic benefits include cash payments (e.g. honorariums) or such other non-cash economic benefit (e.g. trips, stock options, etc.)
- ❖ Shall be performed only outside of assigned working hours
- ❖ Shall not conflict, delay or interfere with an employee's obligation to LSU

Employee Responsibilities

- ❖ Disclose any outside employment to the University
- ❖ Submit a list of all contracts or other agreements between the University and the outside employer
- ❖ Provide notification to the outside employer accepting employment as an individual not as a representative of the University
- ❖ Comply with the provisions of this memoranda

Donation of State Assets

- ❖ The funds, credit, property, or things of value of the State or of any political subdivision shall not be loaned, pledged, or donated to or for any person, association, or corporation, public or private.

Donation of State Assets

- ❖ Exceptions- Some exceptions are provided including but not limited to:
 - ❖ Education
 - ❖ Health care for the indigent
 - ❖ Cooperative Endeavors
- ❖ If you feel your activity may qualify for an exception, please check with the Compliance Office or University Legal Counsel before proceeding.

THE END

Any Questions?

We are here to help!

You can reach the Compliance Department by email at: nocompliance@lsuhsc.edu or by Telephone at: (504) 568-2350