



## Integrity and Compliance Program In Partnership with Our Medical Staff

Integrity Line: 1-888-294-8455

### Partnering with Medical Staff

Along with our Mission and core values, the Providence Integrity and Compliance Program establishes a road map for how we meet our legal, ethical and professional obligations.

This guide provides you with information about areas that have particular application to you as a Medical Staff member.

If you have questions about this information, contact your Medical Staff Office, one of the resources listed on the back of this guide or reference the Providence Code of Conduct.

### Fraud and Abuse Policy

Providence's *Fraud and Abuse Prevention and Detection* policy (PROV-ICP-711) requires that claims must contain true, complete, and accurate information. Physicians should select codes that most appropriately describe the services rendered to a patient. The accuracy of each claim Providence submits is dependent on the documentation you provide including diagnosis and written orders. Providence monitors claims to detect errors and inaccuracies, and to prevent false claims. However, you should not rely solely on our detection processes. Examples of false claims include:

- Billing for services that were not provided or not documented
- Billing for services that are not medically necessary
- Providing services at substandard quality where the government would not pay for the services

If you become aware of a mistake that could affect a claim for payment, please report the concern using one of the suggested **reporting processes** so the error can be corrected.

Fraud, abuse and false claims are serious. Individuals who report their concerns are protected from retaliation under Providence policy, and federal and state whistleblower laws.

### Referrals

Federal and state Anti-Kickback statutes and the federal Stark laws apply to many relationships between Providence hospitals, other entities and physicians. Providence expects patient referrals and admissions to be accepted solely on the basis of patient's medical needs and our ability to provide the needed services. Providence may not offer nor may a physician accept any inducement for a patient referral.

### Respectful Work Environment

In keeping with the Providence Core Values of Respect and Compassion, and maintaining a respectful work environment for all, you should expect that you will treat everyone you encounter in our hospitals, clinics and other facilities with equal respect and fairness at all times.

No Providence Medical Staff member, employee, patient, family member or visitor should tolerate disrespectful or disruptive behavior in any Providence facility.

You should report such behaviors to your Medical Staff Office or one of the resources listed in this guide.

### Conflicts of Interest

Conflicts of interest occur when personal interests or activities influence or appear to influence actions and decisions. Examples include:

- Using your influence to recommend the selection of a vendor, contractor, product or supplier, including medical devices and pharmaceuticals, when you have a financial interest. This includes receiving consulting