MISSION

Exemplary patient and family-centered care, education and research to improve the health, wellbeing and productivity of the people of Missouri and beyond.

VISION

The University of Missouri Health will be the model health system for exemplary patient and family-centered care, learning and discovery through an integrated inter-professional approach.

CORE VALUES

Exemplary Health Care ♦ Respect ♦ Responsibility

Discovery ♦ Excellence
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Letter from the Leadership of MU Health

MU Health is committed to being values-driven in fulfilling our mission to use education and research to provide outstanding patient care and to improve the health of individuals and communities.

Each of us – doctors, nurses, professors, support staff – has an individual responsibility to do things right and to do the right things. This requires first that we understand the policies, rules and regulations that apply to the work that we do. Secondly, it means that we put our values into action, act with integrity and are compliant with these policies, rules and regulations. Every day we each have the opportunity to make a profound difference. This could be at the bedside of a patient; at a computer screen; in a research lab; in the dining room, hallway or parking lot; or in a meeting or at our work station. What we do and say, how we act and how we interact all reflect on us as individuals and on our roles as MU Health employees.

Excellence is one of the core values that we strive to put into action. Excellence means being satisfied with no less than the highest goals and working together to achieve high standards across our organization. Being people of integrity and acting in compliance with policies, rules and regulations are building blocks toward achieving excellence in all that we do.

Thank you for your support of our Integrity and Compliance Program. Please use this manual to help guide the course of your respective job duties and responsibilities. If you have questions pertaining to content of our Code of Conduct Manual, discuss them with your supervisor, or contact a member of the Office of Corporate Compliance. We are in this together, and we are in it for the good health of the many people we serve.

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Exemplary Care · Respect · Responsibility
Discovery · Excellence
An Overview

MU Health is committed to being values-driven in fulfilling our mission to use education and research to provide outstanding patient care and to improve the health of individuals and communities.

Exemplary patient and family-centered care, education and research to improve the health, wellbeing and productivity of the people of Missouri and beyond.

The University of Missouri Health’s mission is to provide outstanding patient care utilizing education and research to improve the health of the patients and communities we serve. In order to achieve this mission, all MU Health employees, faculty and staff commit to the following five core values: providing exemplary health care, respect, responsibility, discovery and excellence as we go about our daily jobs. We also commit to fulfilling all professional and legal obligations, specifically to abide by the rules, regulations and laws that govern us. These commitments apply to all of us working in MU Health, whether providing patient care, conducting research, educating students, maintaining facilities, preparing meals, or other services. Doing so enables us to achieve the highest level of organizational integrity which is vital to achieve our mission. Organizational integrity is at the core of being a great health system. Integrity requires a well-defined set of values and beliefs that guide the definition of our behaviors, systems, and practices. A strong culture of integrity assists in attracting and retaining talented faculty and staff. It further creates an environment that enables those talented people to realize their full potential.

Compliance asks, “Can we do this?” Integrity asks, “Should we do this?”

The University of Missouri Health’s Integrity and Compliance Program, and Code of Conduct, support a strong culture of integrity and compliance.

The Integrity and Compliance Program exists to support our mission, by providing guidance, education and tools to assist us with fulfilling these commitments, to better understand the regulations and laws that govern our work, and to put our values into action as we go about our daily jobs. Doing the right thing every time is our goal, and the Integrity and Compliance Program informs so that we can achieve that goal. The Code of Conduct serves as the foundation for the Integrity and Compliance Program and further demonstrates our commitment to ethical and legal behavior. These standards set forth the policies and practices on which we base our compliance thinking and actions and are a practical extension of our core values.
Think of the Code of Conduct as putting our values into action. The Code includes expectations of actions and behaviors of our employees, faculty and staff which support and protect the integrity of the health system. The Code further guides our day to day actions as we endeavor to provide the highest quality of patient and family centered care, educate future health professionals, and conduct research in the most professional and responsible manner.

The Code of Conduct applies to all members of our health system’s workforce including:

- Administration, directors, managers
- Faculty physicians, health care professionals
- Deans, fellows, residents, students
- Employees full and part time
- Volunteers
- Vendors and independent contractors performing work on behalf of MU Health

There are six principles within the Code that set the foundation for a culture of integrity. Specifically, all of us at MU Health agree to:

1. **Treat everyone we encounter with dignity and respect.**
2. **Conduct all activities in compliance with applicable laws and regulations.**
3. **Protect the privacy and confidentiality of patient information as well as proprietary information concerning our organization and its employees.**
4. **Conduct activities and relationships with others so as to avoid conflicts of interest.**
5. **Be trustworthy stewards of the resources entrusted to us.**
6. **Conduct all research in a responsible, ethical and professional manner.**

It is important that each of us understands the expectations set forth in the Code of Conduct and asks questions when there is a lack of clarity. Achieving organizational integrity is dependent upon our commitment to ethical and compliant behavior. For more information or to ask a question, please contact the Office of Corporate Compliance:

Phone: 573-884-0632
Email: compliancec@health.missouri.edu
The Integrity and Compliance Program

Background:

The design and implementation of an effective compliance program is largely influenced by the Federal Sentencing Guidelines. The Sentencing Guidelines set standards that have become the norm for all organizations, whether public or private. Organization may avoid investigations and convictions by demonstrating that their program is consistent with these guidelines. The standards consist of two fundamental elements:

1. Exercise due diligence to prevent and detect criminal conduct, and
2. Promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

In addition, and more specifically, the U.S. Department of Health and Human Services Office of Inspector General requires the following elements for a compliance program to be considered effective:

1. Designate a compliance officer and compliance committees.
2. Develop written compliance plans and policies and standards of conduct.
3. Monitor and audit compliance risk areas.
4. Develop open lines of communication, including hotlines and other forms of communication.
5. Conduct appropriate training and education.
6. Enforce disciplinary standards.
7. Respond to detected deficiencies.

The University of Missouri Health’s Integrity and Compliance Program adheres to these guidelines. In 1998, the Office of Corporate Compliance was established to work jointly with the University of Missouri Health and the Physicians Practice Plan to develop compliance plans and standards of conduct to assist faculty, employees and staff to be compliant with ethical and legal rules and regulations in their daily jobs. The Schools of Medicine, Nursing and Health Professions each had their own compliance officer, compliance plans, and expectations of behavior. In 2012, the Executive Vice Chancellor for Health Affairs revised this structure to improve the effectiveness of the compliance function and achieve the highest level of organizational integrity. This reorganization included the designation of one Office of Corporate Compliance (OCC) for the health system, responsible for supporting all faculty, employees and staff in the health system.
In addition, a compliance program for the health system was developed and applied universally to the workforce across the organization. The effect of these changes resulted in an OCC serving as an integrated resource providing support, education, training, auditing and monitoring, and other services to all who work within MU Health.

### Elements of an Effective Compliance Program

#### 1. Designate a compliance officer and compliance committees

The Office of Corporate Compliance is charged with developing, implementing, and overseeing the requirements set forth in the Integrity and Compliance Program. The OCC consists of a multi-disciplinary team of professionals in specific compliance areas to provide expertise, guidance and support to the MU Health workforce. These areas include clinical trials research, regulatory affairs, internal audit, compliance, coding analysis, among others. An organizational chart is attached for your information. Please do not hesitate to contact these individuals if you have questions and/or need additional information. We are here to support you!

The Executive Compliance Committee is the governing body which supports the work of the OCC and is responsible for approving compliance plans, policies and standards of conduct that impact faculty, employees and staff. Members of the Executive Compliance Committee include the Executive Vice Chancellor of Health Affairs, the University Missouri Health CEO/COO, the Deans from the schools of medicine, nursing and health professions, the Chief Financial Officer, the Chief Information Officer, two members from the Office of General Counsel, among others. This committee meets quarterly and is chaired by the Chief Compliance Officer. In addition, University Physicians (UP) has designated a committee specifically to address compliance matters impacting physicians. The Professional Liability and Compliance Committee is charged with reviewing policies and procedures, risk management issues, documentation guidelines, among other issues and makes recommendations to UP leadership on these and other matters.

#### 2. Develop written compliance plans, policies and standards of conduct

MU Health follows the Collected Rules and Regulations of the University of Missouri as its foundation for setting policy. Thereafter, specific policies and procedures are developed which build upon these rules and further enhance our commitment to organizational integrity. These policies can be found on MU Health’s intranet (Navex) and are available to all faculty, staff, employees, and students. These policies provide more specific direction regarding compliance...
responsibilities, reporting concerns, government audits, policy of non-retaliation, conflicts of interest, charitable gifts, preventing fraud, waste and abuse, the Code of Conduct, among others. Please take a moment to become familiar with these policies and do not hesitate to call the OCC if you have questions or need additional information.

3. Monitor and audit compliance risk areas

Inherent to the complexities of a health system is the potential for operations, services, or other areas to run afoul of current policy, regulations, or the law. The laws governing health care providers are often confusing, sometimes vague, and often require a compliance professional’s interpretation to a particular situation or process. This is particularly true in the coding and billing arena. Accordingly, an annual risk assessment for the health system is conducted in collaboration with the Internal Audit office of the University of Missouri. The risk assessment identifies those compliance risk areas common to all health care systems as well as those specifically related to our organization due to services provided or our strategic plan. The category of these areas include revenue cycle, operations, human resources, compliance and regulatory, information technology, academics and research, quality, among others. Once identified, risk areas are prioritized according to the impact of the risk, policies and processes underway to correct, whether management is addressing the risk, and then audited to insure we are addressing these areas in the most effective manner. If it is determined that a change in current practice or service is needed, a corrective action plan is issued. Management is then responsible for seeing that the corrections are implemented in a timely fashion with support from the OCC. Monitoring and auditing validates that the Integrity and Compliance Program is working, and that the organization is operating with integrity.

4. Develop open lines of communication, including hotlines and other forms of communication.

Compliance is everyone’s responsibility. That means we all have a duty to report promptly and in good faith any potential concern that we believe violates law, regulations, policies, or the Code of Conduct. Reporting a potential violation can be completed in several ways:

- Speak to your supervisor or manager about the issue. If they cannot help you, or you do not consider them a suitable source, then a different option is to;
- Contact the OCC at 573-884-0632. We will immediately investigate the concern and will maintain your confidence to the extent possible. We may also enlist the assistance of other departments with the investigation if appropriate, for
example, if the concern involves harassment, work environment, or discrimination then we would ask for human resources to assist us, if the concern involves physical security, theft or abuse of property then we would contact security, or if the concern is quality of care concern, then we would ask the Chief Quality Officer for assistance. In any event, please be assured that your concern will be addressed in a timely and appropriate manner.

• If you prefer to report the concern anonymously, then please call the University of Missouri Ethics and Compliance Hotline number at 1-866-447-9821 or go online at [https://www.compliance-helpline.com/UM.jsp](https://www.compliance-helpline.com/UM.jsp) This number is answered 24 hours a day seven days a week by a third party who specializes in receiving hotline calls. The information you report will be kept confidential and you may remain anonymous. At the close of the call you will receive a unique identification number so that you can check on the status of the investigation. All hotline reports concerning MU Health are sent to the OCC for investigation and review. Hotline reports are investigated in a prompt and timely manner and the results updated into the hotline reporting system.

Open lines of communication are critical to achieving organization integrity. Accordingly, MU Health has a strict policy that forbids retaliation against an employee, faculty or staff who reports a concern in good faith. In other words, making a report will not put your job at risk. Anyone who retaliates in any way against the person reporting the concern is subject to immediate disciplinary action including termination.

5. Conduct appropriate training and education

Compliance education is paramount to an effective compliance program. The University of Missouri Health requires that all faculty and staff complete compliance training annually. Mandatory education and training includes:

• Compliance Orientation Programs for new faculty, employees and staff;
• *Code of Conduct* training followed by testing to determine understanding and effectiveness of training;
• Conflict of interest education and completion of a disclosure statement to determine outside financial interests;
• Fraud and abuse education;
• Documentation and coding learning modules (LMS) for new faculty;
• Additional compliance programs are offered throughout the year and cover areas such as compliance in clinical trials research, HIPAA/Privacy/HITECH education, among others.

Providing appropriate compliance education and training is essential for an effective compliance program, as well as vital to achieving the highest level of organizational integrity.

6. Enforce disciplinary standards

We are each responsible and accountable for our actions and their outcomes. Faculty, employees or staff who break a law or standard are responsible even if he/she reports it. MU Health has policies regarding what disciplinary action may be taken in the event a member of MU Health workforce violates the law, policies, regulations, and/or the Code of Conduct. Information will be provided to leadership, management or the deans depending upon the extent and/or seriousness of the violation. Human Resources with input from legal counsel and the OCC if indicated will address these violations with the individual and confirm what disciplinary action will be taken. For example, an employee who willfully discloses protected health information for personal gain is treated with much more severe consequences than an individual who accidentally discloses. Again, it is important that we follow the laws, regulations and standards that govern our behaviors and actions, and which support our core values. Doing so ensures that we maintain the level of organizational integrity expected of a best in class academic health system.

7. Respond to detected deficiencies

Whether we learn about a potential problem or deficiency in the organization through the audit and monitoring process, investigation of a hotline report, calls to the OCC, or other avenues, prompt action is taken to ensure the problem or deficiency is corrected. For example, if we learn that we have inadvertently overbilled for a procedure using the wrong CPT code, then Medicare is notified and any overpayments returned. If there is a concern regarding the utilization of hospital equipment, then we conduct an investigation and actions are taken to correct the problem if deemed appropriate. The results of investigations completed by the OCC are maintained in the compliance database for future review and reference. Whatever the concern, the OCC appreciates hearing about it. You are the “eyes and ears” of the organization. Without each of us taking the responsibility to report a potential issue, ask a question, or verify that a particular process or service is being done in a compliant manner, we will not be in the best position to achieve our mission, to provide exemplary patient and family-centered care, education and research to improve the health, wellbeing and productivity of the people of Missouri and beyond.
Please do not hesitate to contact us if you have any questions.

Thank you.

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