

Sharp HealthCare's 2014 Compliance Education

Compliance and Ethics Module 1

Learning Objectives

In this module you will learn the following:

- The importance of ethics and ethical decision making.
- A better understanding of Sharp HealthCare's Code of Conduct.
- The meaning of The Sharp Experience to our culture.
- Policies and Procedures to keep in mind.
- How to report a compliance issue or concern.

Objective of a Compliance Program

The objective of Sharp HealthCare's Compliance Program is to detect, prevent and correct unlawful conduct within the corporation.



Objective of a Compliance Program

- To achieve this, Sharp assures that its employees know the law to increase the likelihood that they will obey it by establishing detection and reporting processes.



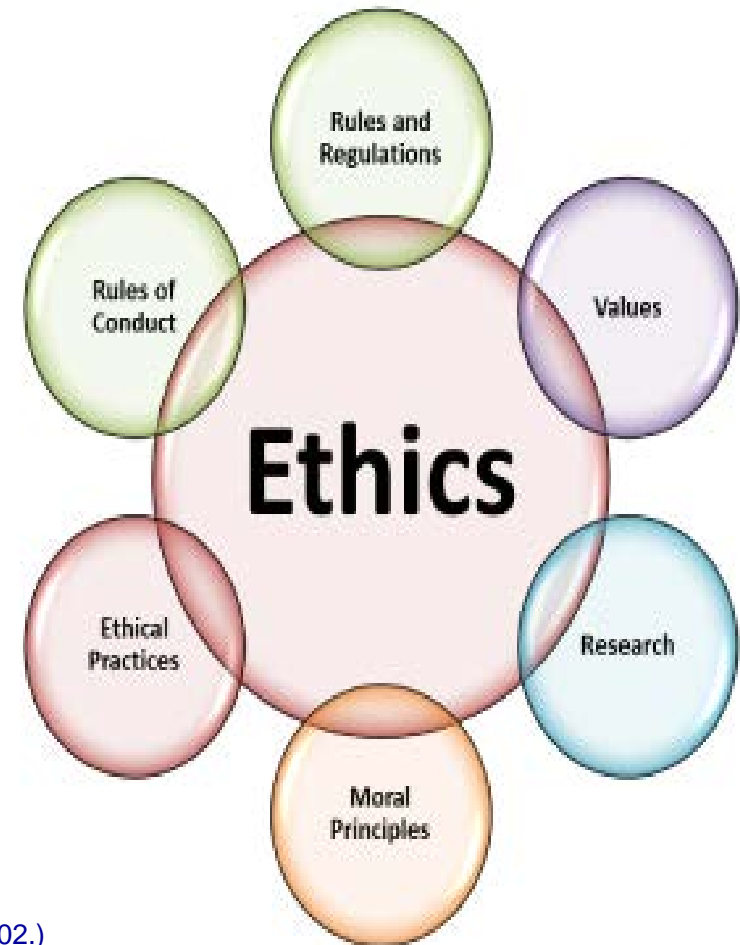
Importance of Ethics



- Another important component of Sharp's Compliance Program is its foundation and roots in solid ethical decision making.

What is Ethics?

- Ethics refers to principles that define behavior as right, good and proper.
- These principles do not always dictate a single “moral” course of action, but provide a means of evaluating and deciding among competing options.



(Source: Making Ethical Decisions by Michael Josephson; Josephson Institute, 2002.)

Making Sense of Ethics



- Making ethical decisions can be difficult.
- We make most of them in a world of economic, professional and social pressures, which can obscure moral issues.
- We must rank competing moral claims and be able to predict the likely consequences of choices.

(Source: Making Ethical Decisions by Michael Josephson; Josephson Institute, 2002.)

Making Sense of Ethics

- Ethical decision-making requires more than a belief in the importance of ethics.
- It requires ethical sensitivity to implications of choices.
- The ability to evaluate complex, and incomplete facts; as well as the skill to implement ethical decisions effectively.



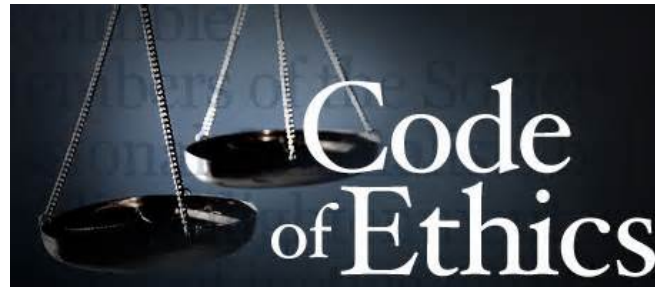
(Source: Making Ethical Decisions by Michael Josephson; Josephson Institute, 2002.)

Making Sense of Ethics

- Most of all, it requires a framework of principles that are reliable (such as the Sharp Behavioral Standards) and a procedure for applying them to problems and decision making.



Compliance and Ethics Programs



“A good compliance program must emphasize values and moral responsibility, because this increases the program’s effectiveness among employees.”

Dawn-Marie Driscoll (cited by Judge Diana E. Murphy
Chair of the U.S. Sentencing Commission in 2002)

From Values to Principles



- We translate values into principles so they can guide and motivate our ethical conduct.
- Ethical principles are the rules of conduct that derive from ethical values.

(Source: Making Ethical Decisions by Michael Josephson; Josephson Institute, 2002.)

From Values to Principles



- For example, honesty is a value that governs behavior in the form of principles such as:
 - tell the truth
 - don't deceive
 - be candid
 - don't cheat
- In this way, values give rise to principles in the form of specific “dos” and “don'ts.”

(Source: Making Ethical Decisions by Michael Josephson; Josephson Institute, 2002.)

Ethics and Action

- Ethics is about putting principles into action. Consistency between what we say we value and what our actions say we value is a matter of integrity.



(Source: Making Ethical Decisions by Michael Josephson; Josephson Institute, 2002.)

Ethical Decision Making

Being ethical is about more than merely complying with the letter of the law. It is about doing the right thing when the law is unclear.



Leading By Example

We are all personally accountable for our decisions and actions.



Movement from Compliance to Ethics

Sharp Recognized as World's Most Ethical Company (2013 and 2014)

- Sharp continues to incorporate ethics into its Compliance Program, and also into the culture of our organization.
- Our goal is to create a sustainable ethical culture that generates trust, credibility and employee morale.



Good Ethics is Good Sense



- Good ethics is good sense and will only strengthen “The Sharp Experience” by enhancing Sharp’s ethical culture.
- Good ethics are also embedded in the culture and values of Sharp.

Sharp's Ethical Culture

“Putting ethical behavior into action each and every day is a top priority at Sharp because doing what’s right always serves the best interest of our employees, patients, their families and our community.”

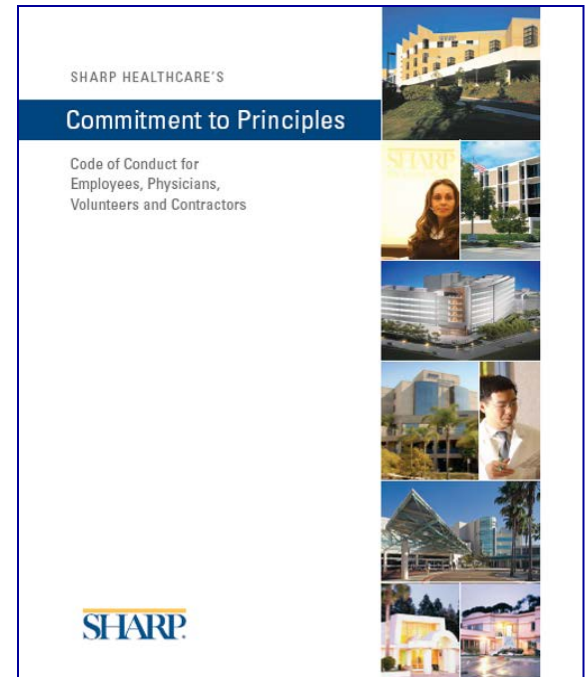
– Mike Murphy, President and CEO
Sharp HealthCare



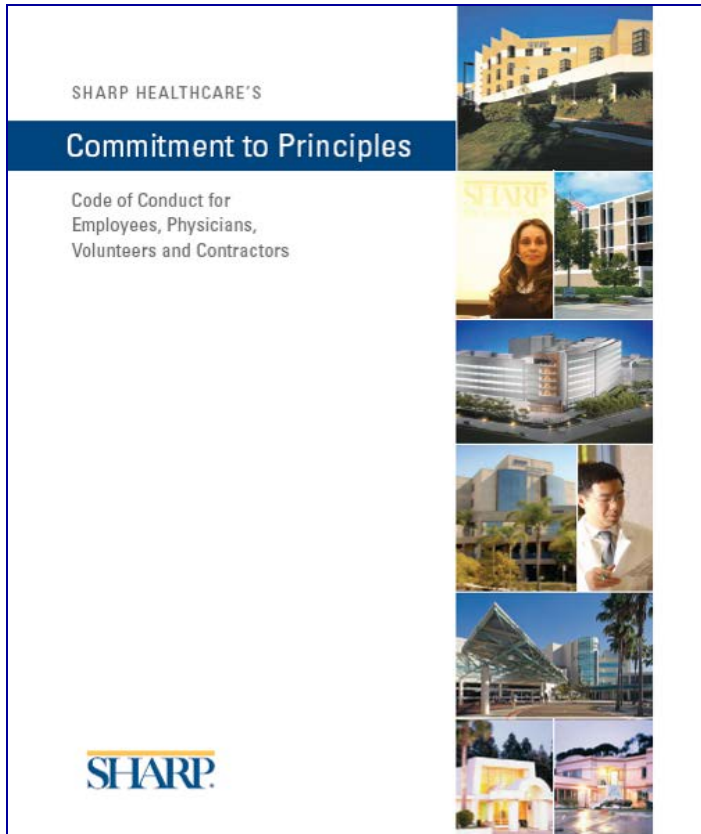
Sharp HealthCare's Code of Conduct

Sharp HealthCare's Code of Conduct:

- Outlines Sharp's fundamental ethical principles.
- Promotes commitment to ethics and "doing the right thing."
- Defines Sharp's Mission, Vision and Values.



Sharp HealthCare's Code of Conduct



- Serves as a valuable resource for resolving ethical dilemmas and answering questions about Sharp's standards of excellence and integrity.
- Offers guidance on employees' ethical and legal responsibilities and provides contact information for further direction.

The Sharp Experience

- We are on an exciting journey, that continues to enhance the way we interact with and serve our patients and their families, our affiliated physicians and our colleagues.
- We call this journey the “Sharp Experience” because it encompasses all we do at Sharp.



The Sharp Experience Begins With You

- Everyone at Sharp is responsible for working together to create a positive memorable experience for each patient, guest and team member.





Transforming the Health Care Experience

Guided by Sharp's Mission, Vision and Values, employees, affiliated physicians and volunteers are transforming the health care experience.

Mission

It is our mission to improve the health of those we serve with a commitment to excellence in all that we do.



Vision

To be the best health care system in the universe. Sharp will accomplish this by redefining the health care experience through a culture of caring, quality, service, innovation and excellence. Sharp strives to be recognized by patients, affiliated physicians, employees, volunteers and the community as:

- The best place to work,
- The best place to practice medicine,
- and the best place to receive care.



Core Values

- **Excellence** – Quality, safety, operational and service excellence, financial results, accountability.
- **Integrity** – Trustworthiness, respect, commitment to organizational values, decision-making.
- **Caring** – Serving others, communication, teamwork, collaboration and celebration.
- **Innovation** – Creativity, continuous improvement, initiating breakthroughs, self-development.

Pillars of Excellence

We are committed to moving Sharp from good to great. Sharp created the six Pillars of Excellence to serve as our guide and stand as a visible testament to our commitment to making health care better.



Pillars of Excellence



- Quality
- Service
- People
- Finance
- Growth
- Community

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Report Cards

Transforming the health care experience requires a commitment to improve at every level. Sharp's Six Pillars of Excellence – Quality, Service, People, Finance, Growth and Community – align the organization and ensure that equal attention is paid to each of these priority indicators.

System and entity report cards are established annually to ensure that progress is made across the organization. The report cards include two to three key goals under each pillar. Aggressive targets are set to ensure organization-wide focus with alignment to pillar goals. Goals are measured and reported quarterly or annually and color coded (green, yellow, red) to reflect achievement to-date.

As a point of reference, view overall and entity system targets.

Entity: Pillar: Fiscal Year: [View Goals](#)

All Charts for This View Print Dashboard View Ratings Key

FY 2014: System Overall					
Quality Pillar (25%)	Q1	Q2	Q3	Q4	Final Score
1. Improve core measures incorporated into Value-Based Purchasin [...] 5%					Available November 2014
2. Reduce in-hospital mortality rates 5%					Available November 2014
3. Reduce hospital acquired infections 5%					Available November 2014
4. Reduce hospital readmission rates 5%					Available November 2014
5. Improve diabetes perfect care measures 5%					Available November 2014
Service Pillar (30%)	Q1	Q2	Q3	Q4	Final Score
Achieve HCAHPS scores greater than 90% 10% across all 11 domains					Available November 2014
Increase patient satisfaction - Medical Group 100%					Available November 2014

Pillars of Excellence

By creating report cards, goals and action steps under each pillar, our organization is focused on what needs to be done to achieve our vision.

Behavior Standards



Attitude is Everything

Create a Lasting Impression



Thank Somebody

Reward and Recognition



Make Words Work

Talk, Listen and Learn



Teamwork

All For One, One For All



Make It Better

Service Recovery



Think Safe, Be Safe

Safety at Work

Behavior Standards



Look Sharp, Be Sharp *Appearance Speaks*



Keep In Touch *Ease Waiting Times*



It's a Private Matter *Confidentiality*



To "E" or Not to "E" *E-mail Manners*



Vive La Difference *Diversity*



Get Smart *Increasing Skills and Competence*

Making a Difference

We know it is often the little things that create a meaningful connection with our patients.



The Five Must-Haves

- **Greet people with a smile** and say “Hello,” using their name when possible.
- **Take people where they are going**, rather than pointing or giving directions.
- **Use key words at key times.** “Is there anything else I can do for you? I have the time.”
- **Foster an attitude of gratitude.** Send hand-written thank you notes.
- **Round with reason** to better connect with staff, patients, family and other customers.

Compliance Policies to Keep in Mind

Gifts and Gratuities

Conflicts of Interest



Gifts and Gratuities

- Sharp's employees are expected to maintain appropriate relationships with third parties. As such, business decisions should be made on merit.
- Employees may not accept cash, loans, special services, payments, or special treatment of any kind from individuals or organizations that conduct or seek to conduct business with Sharp.



Gifts and Gratuities

- Personal gifts or favors should not exceed **\$100.00** as outlined in Sharp Conflict of Interest and Conflict of Commitment Policy #01535.99.
- All personal gifts, favors, or benefits with value exceeding **\$75.00** must be immediately disclosed by completing the Conflict of Interest/Commitment to Disclosure form.
- Employees should never accept cash from a third party. The employee should promptly refer the individual to the appropriate foundation office where arrangements for a donation to Sharp HealthCare can be made.


Conflict of Interest

- No employee shall disclose Sharp privileged or confidential information to any person or organization, or make use of such information for personal gain.
- Be sure that your interests do not compete with Sharp's.

Conflict of Interest

Sharp's Conflict of Interest Policy is straightforward:

- Your business dealings should not be influenced or appear to be influenced by personal or family interests.
- Refer to Sharp's Conflict of Interest Policy #01535.99 for more information.

 <input type="checkbox"/> POLICY <input type="checkbox"/> PROCEDURE <input checked="" type="checkbox"/> POLICY & PROCEDURE <input type="checkbox"/> PLAN	PAGE 1 OF 8		REFERENCE			
	ORIGINAL ISSUE DATE 05/10	CURRENT EFFECT DATE 05/10	CATE/DIV D/S	SECT. # 01	SECT.CODE AO	POLICY /PROCEDURE/PLAN # 01535.99
	TITLE: CONFLICT OF INTEREST AND CONFLICT OF COMMITMENT					
	SUBJECT: Ethics					
KEYWORD(S): COMPLIANCE, GIFTS, GRATUITIES, ENTERTAINMENT, CASH, GIFT CARDS, CONSULTING, FAVORS, REMUNERATION						
<input checked="" type="checkbox"/> All Sharp HealthCare <input type="checkbox"/> System Services Surgery Centers: <input type="checkbox"/> SRS <input type="checkbox"/> CV-OPS <input type="checkbox"/> SCMG <input type="checkbox"/> GPSC <input type="checkbox"/> SHP <input type="checkbox"/> SMH-OPP		AFFECTED DEPARTMENTS: All Departments/Units		ACCREDITATION: The Joint Commission; PC – Provision of Care		
Hospitals (check all that apply): <input type="checkbox"/> SCOR <input type="checkbox"/> SMH <input type="checkbox"/> SCVMC <input type="checkbox"/> SMBHWN <input type="checkbox"/> SGH <input type="checkbox"/> SMV <input type="checkbox"/> SMC		ORIGINATOR: Corporate Compliance / Legal Services		LEGAL REFERENCES: 42 U.S.C. Section 1320A-7(e) 42 U.S.C. Section 1395nn California Code Title 9, § 82028(a)		

I. PURPOSE:

To establish standards of expected conduct for Sharp HealthCare (SHC) and its employees, provide guidelines to avoid conflicts of interest or unethical or unlawful practices, and to ensure that decisions about health care delivery and related activities are performed free from actual or perceived undue influence.

Your Responsibilities

All Sharp HealthCare employees have an obligation to report any actual or suspected violation of the *Code of Conduct*, Sharp's policies and procedures, and/or federal and state laws.



Your Responsibilities

- Reporting suspected violations is not an act of disloyalty. It shows responsibility and fairness to patients, team members, and payors, and protects Sharp's reputation and assets.
- It's never too late to report a problem. Even if a mistake has already occurred and it seems unlikely to happen again.

Reporting Ethics and Compliance Violations

To report a confirmed or suspected violation, you may do any of the following:

- Contact Paul Belton, Sharp HealthCare's Corporate Compliance Officer at (858) 499-3138 or paul.belton@sharp.com.
- Contact your entity Compliance Liaison.
- Contact your manager.
- Report the incident to the Sharp Confidential Hotline at (800) 350-5022.
- File a report online at <http://www.mycompliancereport.com>.
- Complete a Quality Variance Report (QVR).

The Sharp Confidential Hotline

1-800-350-5022

- Available 24/7.
- All calls will be answered by trained staff, independent of Sharp HealthCare.
- Callers may remain anonymous.
- The identity of a caller choosing to identify himself or herself will be held in confidence as permitted or required by law.



The Sharp Confidential Hotline

1-800-350-5022

- Callers will be given a case number so they can check or the status of their call.
- All reports will be forwarded to the Sharp Corporate Compliance Department and will be investigated promptly.



Filing a Report Online




- MyComplianceReport.com is an online tool for reporting confirmed or suspected ethics or compliance violations.
 - Go to www.MyComplianceReport.com, enter “SHC” as the access ID, and follow the instructions.

Filing a Report Online

- A report number, password and date for follow-up date will be provided.
- Individuals choosing to remain anonymous may follow-up by:
 1. Calling the Sharp Confidential Hotline at 1-800-350-5022 and providing the report number or
 2. Visiting www.MyComplianceReport.com and entering the report number and password under “Follow-Up Report”.
- The Corporate Compliance department will follow-up directly with individuals providing contact information.

Sharp Non-Retaliation Policy

 <input type="checkbox"/> POLICY <input type="checkbox"/> PROCEDURE <input checked="" type="checkbox"/> POLICY & PROCEDURE <input type="checkbox"/> PLAN	PAGE 1 OF 4		REFERENCE			
	ORIGINAL ISSUE DATE 02/14	CURRENT EFFECT DATE 02/14	CATE/DIV A/S	SECT. # 01	SECT CODE AO	POLICY /PROCEDURE/PLAN # 01536.99
	TITLE: REPORTING FRAUD, MISCONDUCT & NON-RETALIATION					
	SUBJECT: Compliance KEYWORDS: Mitigation, Non-Retaliation, Fraud, Suspected Fraud, misconduct, retaliation, HIPAA					
<input checked="" type="checkbox"/> All Sharp HealthCare <input type="checkbox"/> System Services <input type="checkbox"/> SRS <input type="checkbox"/> SCMG <input type="checkbox"/> SHP		AFFECTED DEPARTMENTS: All Departments / Units		ACCREDITATION: The Joint Commission - IM		
Hospitals (check all that apply): <input type="checkbox"/> SCOR <input type="checkbox"/> SCV/MC <input type="checkbox"/> SGH		ORIGINATOR: Corporate Compliance		LEGAL REFERENCES: 31 U.S.C. §§ 3729 and 3730(h) Cal. Govt. Code §§ 12650-12653		

I. PURPOSE:

Sharp HealthCare ("Sharp") has a strong commitment to the highest legal, ethical and moral standards. The purpose of this policy is to provide information on reporting potential fraud and/or misconduct. Sharp investigates reports of fraud and misconduct in compliance with federal and California laws and strictly enforces a non-retaliation policy for individuals who report suspected violations in good faith.

- Any employee who reports in good faith an alleged act of misconduct will **NOT** be subject to retaliation or retribution by Sharp.
- Any employee engaging in retaliation for reporting a compliance concern is subject to discipline, up to and including termination.
- For more information on Sharp's Non-Retaliation Policy, refer to Sharp Policy #01536.99, Reporting Fraud, Misconduct & Non-Retaliation.

Exit Instructions

We hope this course has been informative and helpful.

**Please take the
Module 1 Quiz**