# CORPORATE COMPLIANCE

MARYLAND DEPARTMENT OF HEALTH OFFICE OF THE INSPECTOR GENERAL DIVISION OF CORPORATE COMPLIANCE



#### The Corporate Compliance Unit is specifically responsible for:

- Implementing and monitoring the CCP (MDH Policy 01.03.01)
- Investigating misconduct, fraud, waste, abuse, HIPAA/confidentiality violations, conflicts of interest, ethics violations, policy violations, and violations of state and federal laws.
- Monitoring and responding to complaints received from the OIG's Fraud Hotline.
- Providing training and guidance for employees on ethical and legal standards, applicable laws and regulations, coding and billing practices, and standards for documentation.

#### Why we need a Corporate Compliance Program:

- Ethical issues are becoming more common and complex.
- Sixty percent of all corporate fraud is committed by insiders (staff or former staff).
- Increased scrutiny by the Department of Health and Human Services (HHS)
- MDH staff need to be aware of what is required.



**Fraud** - any deliberate misinterpretation of the truth or intentional deception or misstatement used to obtain money or some type of benefit by means of false or fraudulent pretenses, representations or promises.

**Waste** - the over utilization of services or other practices that result in unnecessary costs.

**Abuse** - obtaining payment for items or services when there is no legal entitlement to that payment.

Misconduct - improper behavior, dishonesty, misrepresentation



#### **MDH Code of Conduct:**

- Part of the MDH CCP, designed to foster a culture that promotes the highest standards of ethical behavior and compliance.
- Encourages all staff to report concerns regarding possible or known fraud, waste and abuse promptly.
- Provides practical guidance on what is expected from all employees.







While carrying out the Department's mission, all employees are expected to conduct the Department's business in a consistent and professional manner, adhering to the following principles:



# Perform all activities in compliance with pertinent laws and regulations.



## Participate in and promote high standards of business ethics and integrity.



### Perform all duties accurately and honestly



# Maintain appropriate levels of confidentiality and protect personal information.



Conduct business transactions with suppliers, vendors, contractors and other third parties free from offers or solicitations of gifts and favors.



## Avoid conflicts of interest, and make full disclosure of real or potential conflicts.



Preserve and protect the Department's assets by making prudent and effective use of resources, property, and accurate financial reporting



Refrain from presenting or causing to be presented, any claim or billing for services not provided, or that the individual knows to be false or fraudulent



MDH employees have an obligation to report any incidents of suspected fraud, waste, abuse, or misconduct to the OIG.



### **Accountability:**

Directors and managers are held accountable for:

 Detecting, taking appropriate action and reporting staff noncompliance with the CCP or demonstrations of unethical behavior

- Any retaliation or retribution directed towards individuals who report compliance or ethical concerns
- Patient safety, privacy and satisfaction, where applicable



### To report fraud, waste, and abuse call....







### 1-866-770-7175

www.health.maryland.gov/oig



#### **Financial Disclosure:**

- Staff who are in positions at Grade 16 and above; whose duties include procurement activities, or other designated individuals maybe be required to complete the State Ethics Commission's annual Financial Disclosure statement. New filers must file within 30 days of starting a position requiring financial disclosure.
- The State Ethics Commission electronic financial disclosure filing system form can be found at <a href="effs.ethics.state.md.us">efds.ethics.state.md.us</a>. The State Ethics Commission can be reached at 410-260-7770.





#### **Secondary Employment Disclosure:**

- MDH employees grade 18 and above who administer or direct a program must disclose all employment and compensation outside the Department to the Secretary.
- All affected employees must review, sign, and submit the disclosure form even if no outside employment is held or no compensation is received.
- The disclosure must be made through the Office of the Inspector General webpage <a href="www.health.maryland.gov/oig">www.health.maryland.gov/oig</a>













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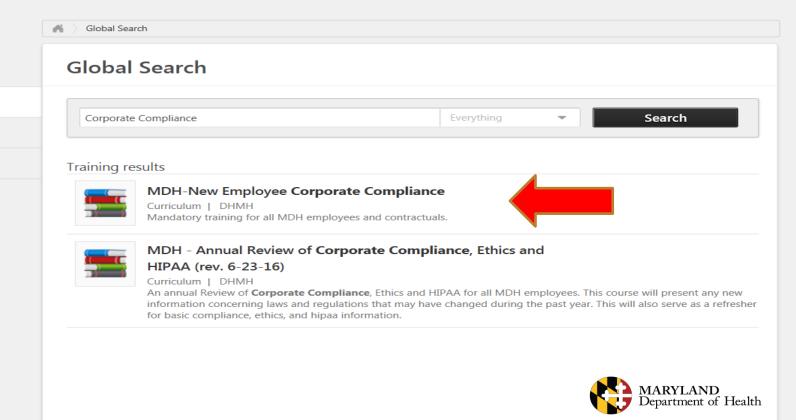
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Reports

ILT Admin

Knowledge Bank

Admin



### The Division of Corporate Compliance

For more information on the MDH Corporate Compliance Program or to make a report of fraud, waste, abuse, or misconduct to the OIG, please contact:

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