



# 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 non-compliance 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](http://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 [efds.ethics.state.md.us](https://efds.ethics.state.md.us). 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 [www.health.maryland.gov/oig](http://www.health.maryland.gov/oig)





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## Global Search

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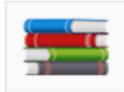
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Corporate Compliance

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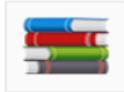
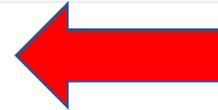
### Training results



#### MDH-New Employee Corporate Compliance

Curriculum | DHMH

Mandatory training for all MDH employees and contractals.



#### MDH - Annual Review of Corporate Compliance, Ethics and HIPAA (rev. 6-23-16)

Curriculum | DHMH

An annual Review of **Corporate Compliance**, Ethics and HIPAA for all MDH employees. This course will present any new information concerning laws and regulations that may have changed during the past year. This will also serve as a refresher for basic compliance, ethics, and hipaa information.

# 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:

Greer Dorsey, Compliance Analyst  
Office of the Inspector General  
410-767-1586