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Compliance and Privacy Officer



# COMPLIANCE PROGRAM

*TONHC Compliance Program – 02.18.2020*

If you think compliance is expensive  
— try non-compliance.

- former US Deputy AG Paul McNulty

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# AGENDA

*Compliance and Privacy Officer*

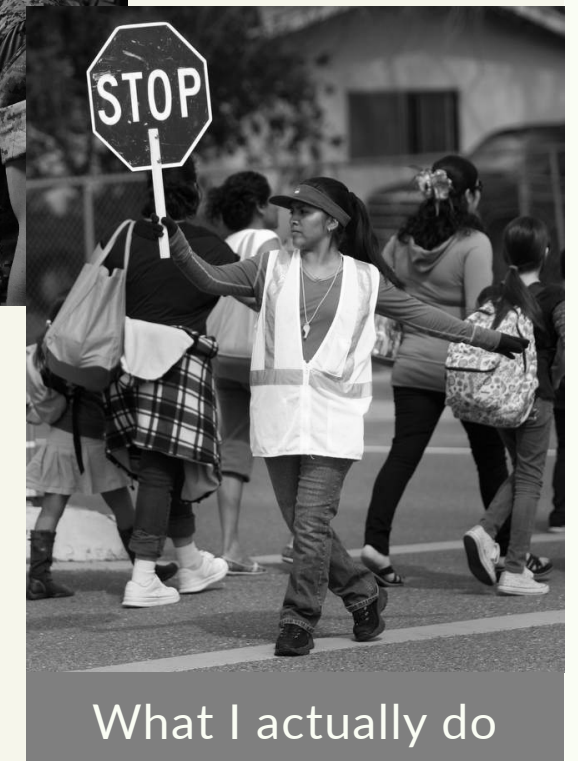
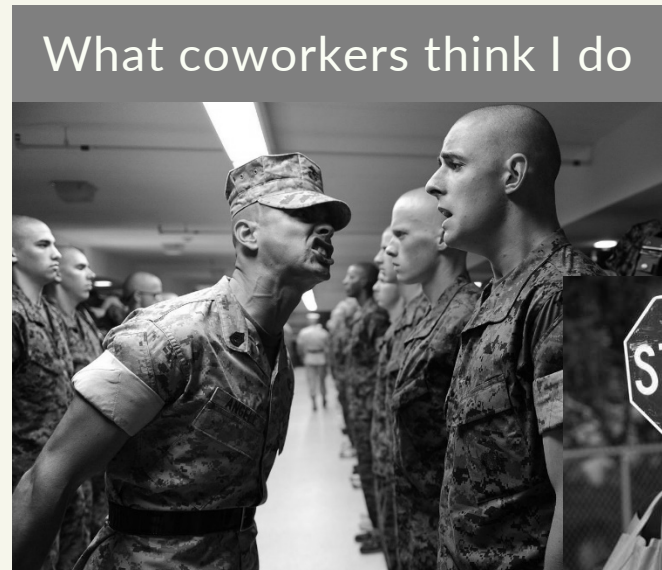
*TONHC Compliance Plan*

*TONHC Additional Policies*



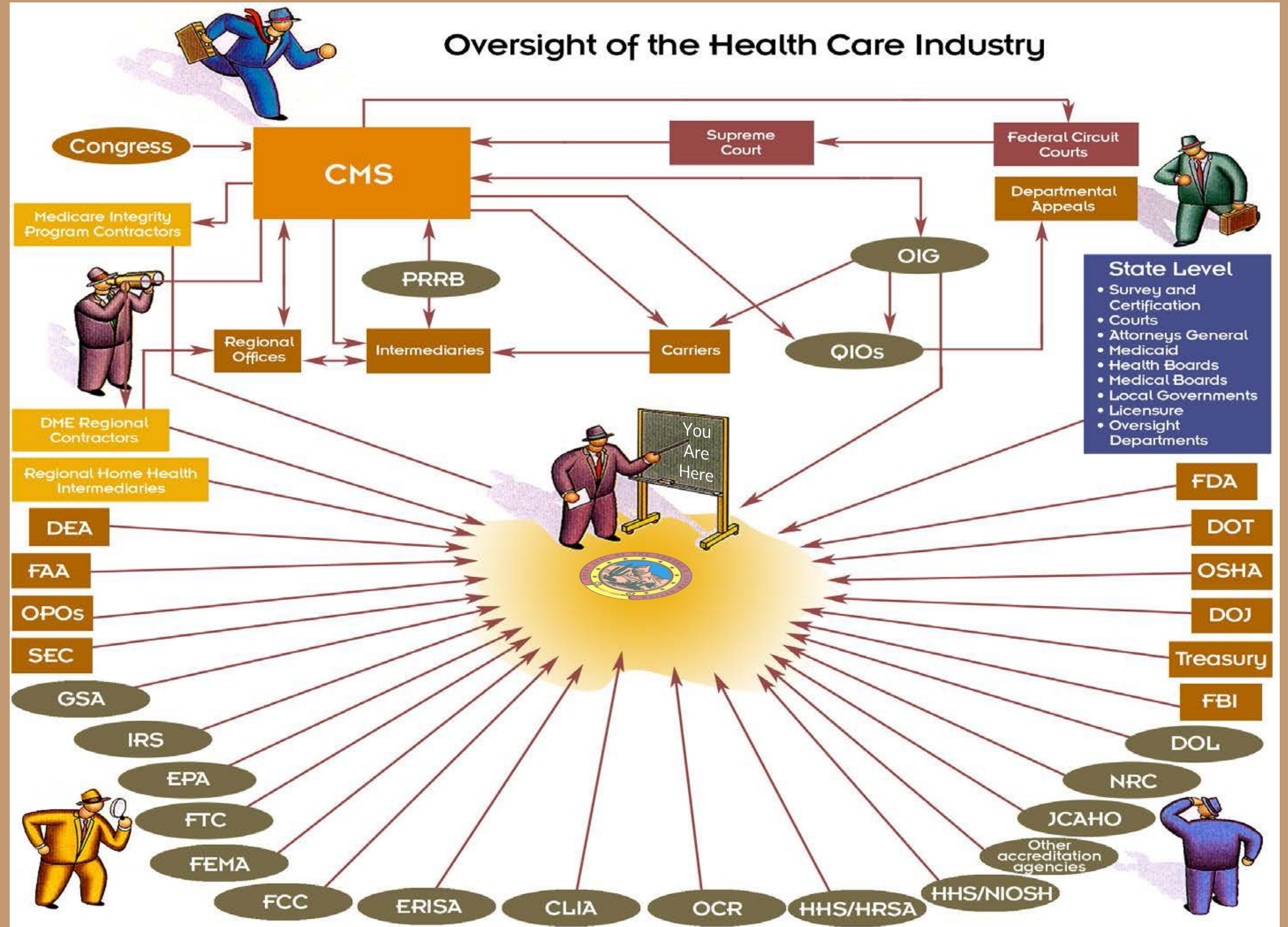
# COMPLIANCE AND PRIVACY OFFICER

- Ensures that a company adheres to regulatory and legal requirements as well as its own internal policies and bylaws
- Identifies, assesses and manages regulatory risk
- Duty-bound to work with both management and employees to ensure that the organization is playing "by the rules"





# OVERSIGHT OF THE HEALTH CARE INDUSTRY







Culture of Compliance

# TONHC COMPLIANCE PLAN

Promoting ethical behavior

# The Mission of Compliance

- Prevention and detecting of wrongdoing
- Maintenance of open communication
- Mitigation of risks
- Increasing awareness of TONHC expectations
- Sustaining a positive reputation and public image for TONHC
- Compliance is a TONHC wide responsibility

## Compliance Program Goals

- Prevention of fraud, waste and abuse
- Promote adherence to federal, state and tribal law
- Conduct business in ethical manner in support of Standards of Conduct, Mission and Vision statements
- Prompt reporting
- Deter, detect and correct improper conduct by employees and managers





Culture of Compliance

# TONHC ADDITIONAL POLICIES



# Dress Code

## TONHC Dress Code Policy

- Outlines the minimum acceptable standard for dress and appearance with the main focus being on professionalism
- An employee may violate this policy by not exhibiting a professional appearance, even though s/he is wearing acceptable items of dress
- Badge required at all times on duty — be clearly visible and properly displayed at chest high level (not around the waist)



## Dress Code

### Special Considerations

- Themed costume days will be allowed based on department director discretion
- Requests for exceptions in dress code for medical, spiritual or religious reasons may be approved by your direct supervisor





# Dress Code

## General appearance:

- Hair clean/controlled as to avoid contact or contamination with patient equipment/supplies
- Facial hair regulated by department as to not interfere with performance/safety
- Fragrance/makeup minimal with understanding that allergies may be triggered
- Ear pierce: only visible allowed
- Offensive tattoo covered



## Dress Code

- Clothing should not be:
  - Revealing, tight, sheer, ripped, frayed or sagging (pants below waist)
  - Dirty or in disrepair
  - Denim or jean-styled (exception Facilities/Maintenance), sweats or sweat material or graphic tee shirts
- Shoes should not be:
  - Flip-flops
  - Dirty or in disrepair; direct Caregivers should wear closed-toed, noise resistant sole and heel shoes with hosiery or socks at all times

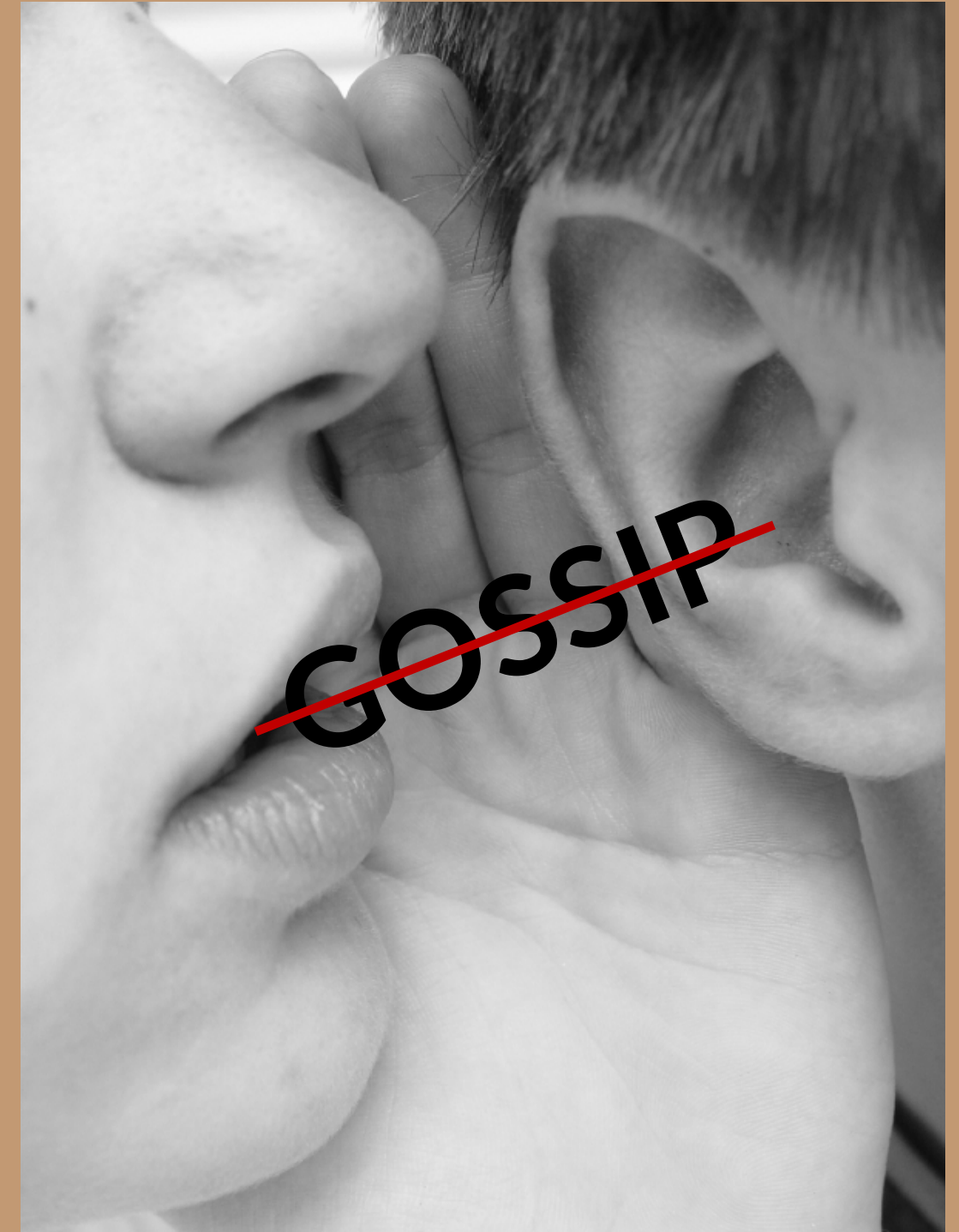




# Dignity and Respect

*Everyone* has the right to be treated with *dignity* and *respect*

- Speak about people as if they will hear what you have said
- If an issue arises, address it professionally, not personally — Everyone involved loses a degree of respect and credibility when disputes are public
- Anger is an *emotional* response; not a *professional* one. Be civil — you don't have to like someone to work with them



# Dignity and Respect

Always be aware of those around you:

- Think about the impact of your words before you say them; they may impact others around you that are not the intended target
- What may be acceptable to you may not be acceptable to others (e.g. cursing)
- Derogatory remarks will not be tolerated. If a person offends you inform them. If it persists then report to your supervisor.

\* Remember: a curtain is not the same as a wall





# ADDITIONAL POLICIES

## Friendly reminder ...

EVERYONE

DIGNITY

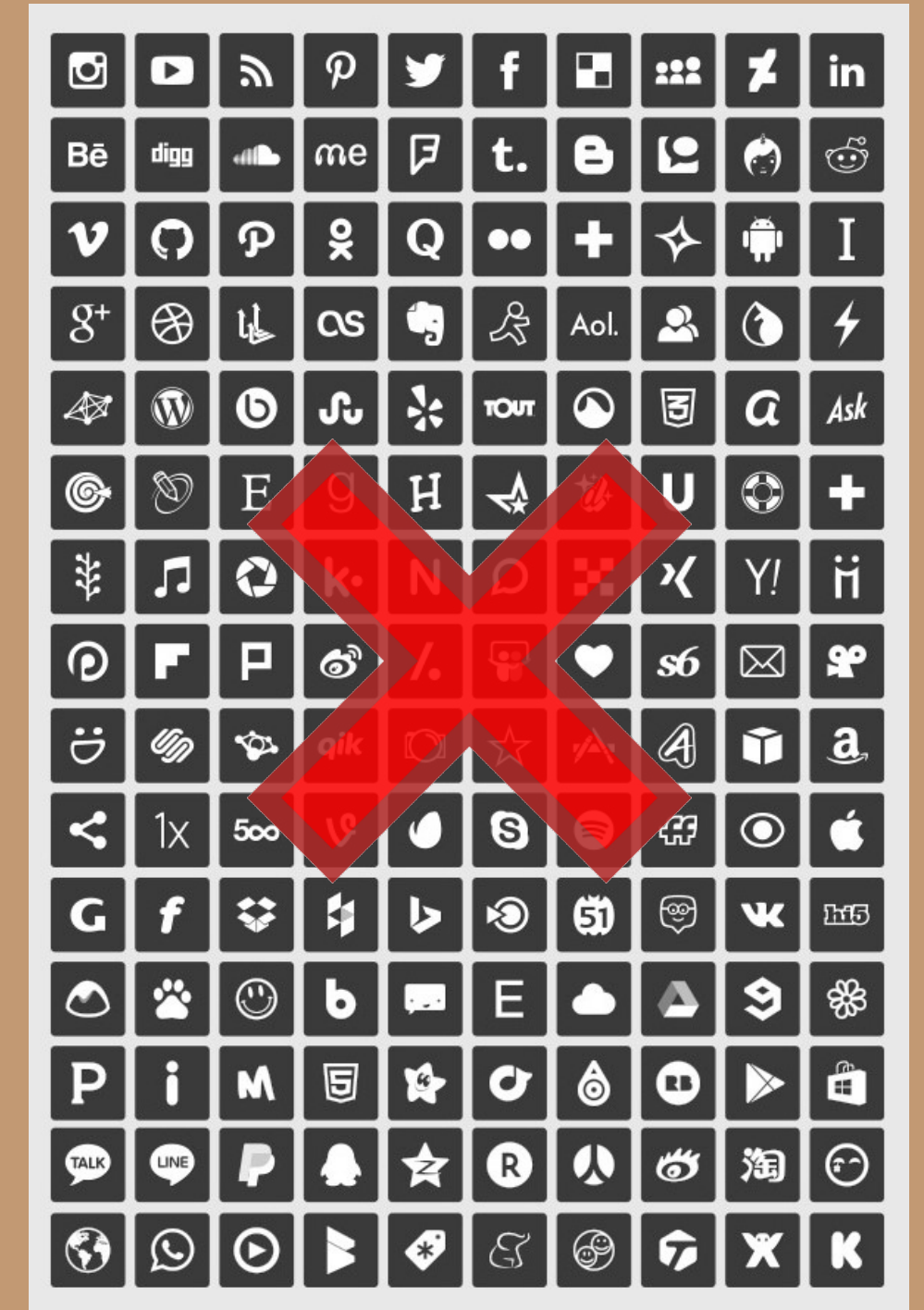


RESPECT

EVERYONE

## Social Media

- Defined as technology and software that enable users to create and share content or to participate in social networking online (not intended to restrict flow of useful information)
- Purpose:
  - Protect privacy
  - Minimize exposure
  - Preserve safety — harassment, threats, retaliation (both internal and external)
- Engaging in social media during work time is not permitted





## Social Media

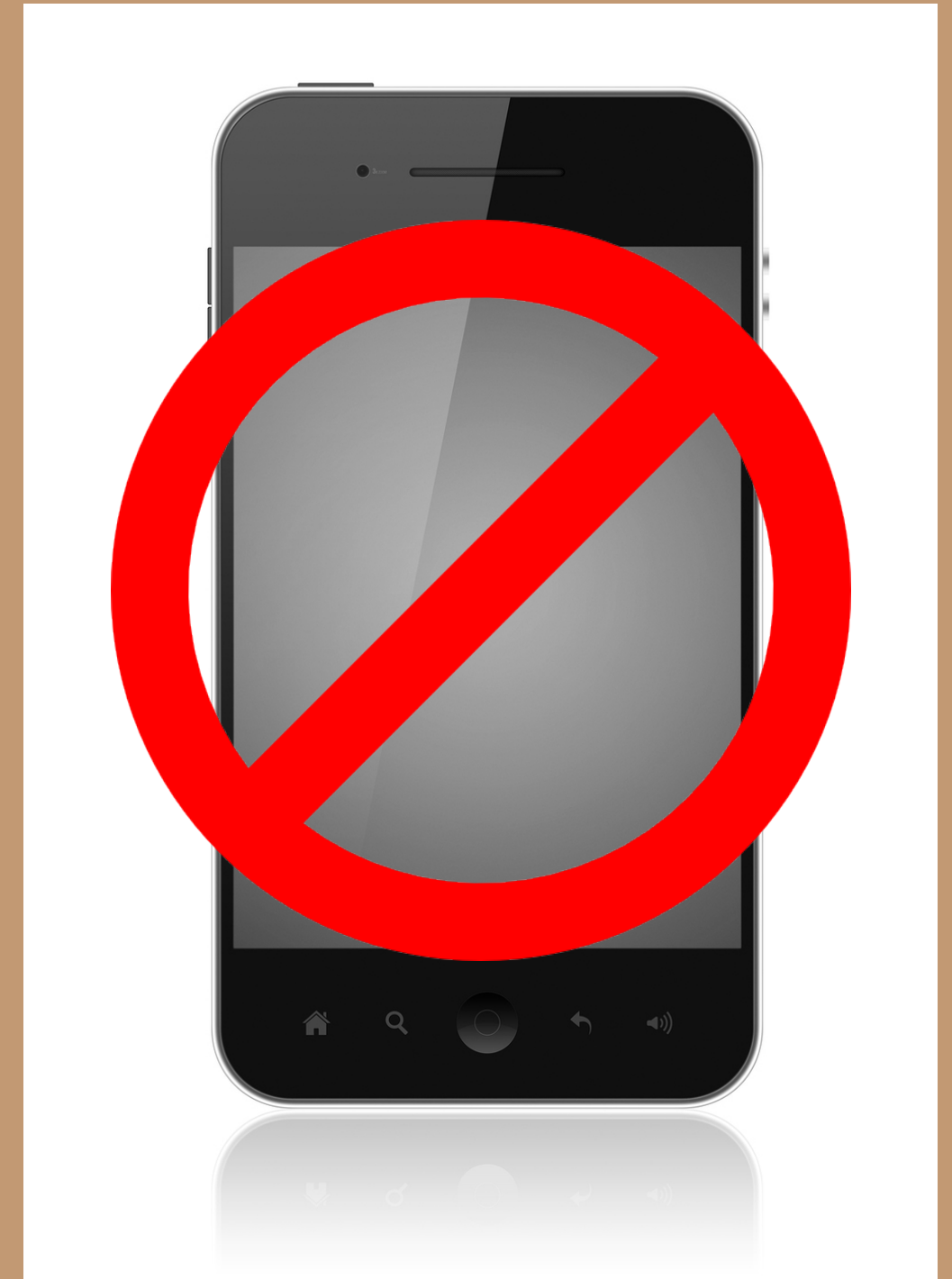
- E-mail and internet access are provided for official use only; incidental use for personal matters is permitted, however excessive use (as defined by direct supervisor) may lead to disciplinary action
- Disclosure of any PHI or any confidential or proprietary information about TONHC is forbidden
- Members of the team that are *authorized* to speak on behalf of TONHC should consult and adhere to the guidelines (Sec. IV) found in the Social Media Policy available in the Quality Management folder on your desktop



# Cell Phone

Policy exists to protect the patients, employees and the organization. Use of personal devices also creates an exposure in which legal liabilities and consequences may fall upon YOU as an individual.

- Use of personal device only on break time and only in designated break areas
- If it becomes necessary to use a mobile device to contact a provider for orders or to relay patient data, only TONHC issued devices will be used
- Receiving a text for an order on your personal device (even without identifiers) constitutes a violation of this policy



# Cell Phone

- Ringers or automated notifications should be changed to vibrate or muted
- Use of camera on personal device is strictly prohibited while on duty
  - If a patient authorizes photos for diagnostic or academic reasons, written consent should be obtained on the correct form
  - A TONHC issued device MUST be used
- Distribution of your personal number for TONHC business purposes or healthcare matters is forbidden



**No Cameras  
Allowed**



Words are free, its how you use  
them that may cost you.

- *Rev. J Martin*

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# QUESTIONS?

*Please complete the forms labeled Social Media  
Guidelines Agreement and Do Not Use  
Abbreviation Attestation. Keep a copy for your  
records and please submit the original document  
to your direct supervisor.*

# CONTACT



*TONHC Compliance and Privacy Officer*

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