

CORPORATE COMPLIANCE MATTERS

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CONNECT & COMPLY WITH COMPLIANCE HOTLINE: 844|371|4700 24/7

"Compliance is Every One's Responsibility" **SPECIAL 6TH YEAR EDITION** 2 pages

Q & A's:

1] Q. Can any employee whether full time, part time, pay diem, per visit may call the Hotline number anytime and leave a message anonymously?

A: Yes, call anytime. Hotline is open 24/7.

2] Q. You received a gift card from a Member, Patient or Client for your help. Can you keep it?

A: No. Notify your Supervisor, Compliance or Executive office right away with the gift card. Inform the person it is EverCare policy NOT to accept gifts.

3] Q. An employee asks if we may be going too far in safeguarding PHI?

A: Not at all. Improper uses and disclosures can invade one's privacy, damage reputations, cause embarrassment, violate federal/state privacy laws, violate agreements and carry high penalties for all involved.

EVERCARE'S ANNUAL CORPORATE COMPLIANCE TRAINING BEGINS IN SEPTEMBER. This year's training will follow last year's successful three [3] steps process with ADP, Relias and documentation. Remote training begins the week after Labor Day. Please be on the lookout for a Memo to be sent out to all staff shortly with all the details.

PHISHING TIMES: What happens when you receive an email that does appear to be suspicious in content, relevancy or unrelated, and has a link? **DO NOT OPEN the link or any attachments or respond to it!** If you do, it could install malware on your computer. Also check the email to see the actual address it was sent from - most likely, it has been sent from a totally different email address. Report this to our IT Manager or RSM or Compliance. Remember, **DO NOT click on any links or attachments unless you recognize the sender and know the content is safe.** Cybercriminals aim is to trick you into providing information by clicking on their link or attachment in order to download malicious software to access your information.

PROTECTED HEALTH INFORMATION [PHI] AND ENCRYPTION OF EMAILS: When sending PHI via email, there are three [3] risks for exposure: **1]** Email sent to wrong person or organization usually due to a typing error or selecting the wrong name from the auto-fill list. **2]** The email transmission could be captured en route by hackers if the email was not encrypted in subject line with "secure" that helps to provide a safe transmission. **3]** If email is sent to wrong person or firm and not immediately recalled – contact the party it was sent to and have the email deleted by the sending/receiving party.

HOW TO RECALL AN EMAIL YOU SENT WITH PHI IN ERROR: Immediately attempt to **recall the email by:**

- 1] Go into sent items folder and open the sent email
- 2] Click on "Actions/More Move Actions" click "Recall this Message" OK
- 3] Click "Delete unread copies of this message"
- 4] If successful, delete unread copies of the email for each recipient
- 5] If not successful, immediately contact the person or provider and request the email to be deleted and have it confirmed.

COMPLIANCE means for all of us to opt for the most ethical and honest path no matter what - each and every time - in the best interest of our Members, Patients and Clients, for EverCare and your work.

FALSE CLAIM ACTS [FCA] requires compliance with all NYS and federal laws - prohibits submission of any false claims especially in connection with Medicaid and Medicare healthcare programs.

TOP ACRONYMS:

CDPAP: Consumer Directed Personal Assistance Program
CIN: Client Identification No.
CFEEC: Conflict-Free Evaluation & Enrollment Center
EOC: Episode of Care
EVV: Electronic Visit Verification
FI: Fiscal Intermediary
FWA: Fraud, Waste & Abuse
HIPAA: Health Insurance Portability & Accountability Act
LDSS: Local Department of Social Services
LUPA: Low Utilization Payment Adjustment
MFA: Multi-Factor Authentication
MMCOR: Medicaid Managed Care Operating Tool
MN: Medically Necessary
NAMI: Net Available Monthly Income
NTUC: Not Taken Under Care
NFLOC: Nursing Facility Level of Care
OASIS: Outcome & Assessment Information Set
OCL: Open Case List
PAH: Potentially Avoidable Hospitalizations
SADC: Social Adult Day Care
UAS: Uniform Assessment System
UR: Utilization Review

The Charity Care Program is part of EverCare At Home, our Certified Home Health Agency [CHHA]. CHHA will fund the cost of service for those receiving charity care, at a sliding scale fee schedule, if a patient's annual income is less than 200% of the Federal Poverty Level [FPL]. You can call 855-485-6697. Anyone can refer a patient to CHHA for the Charity Care Program.

EVERCARE COMPLIANCE HOTLINE *is not equipped with caller ID or devices that can trace your phone number from which are calling from.* Anonymity is ensured! You should describe the situation and details in order for the matter to be properly addressed. Reporting in good faith will be fully protected against any form of retaliation.

WHAT IS PROTECTED HEALTH INFORMATION: First of all, All Staff, providers, volunteers must assure that all of our Members, Patients and Clients information is properly protected. It actually consists of eighteen **[18] identifiers** as defined by HIPAA. These identifiers include a person's name; postal address; all elements of dates we except year; telephone and fax numbers; email address; Social Security Number, Account numbers; license numbers; medical record number; health plan beneficiary number; URL and IP addresses; full face photos and other comparable images; biometric identifiers/finger and voice prints; device identifiers/serial number and any other unique identifying number, code or characteristic.

QUIZ: WHICH OF THE FOLLOWING IS THE ONLY acceptable reason allowing you to access PHI? 1] The member, patient or client does not mind if I took a look. 2] I need to read it in order to perform the duties of my job. 3] No one is watching me. 4] I am curious. Answer. #2

MEDICAL RECORDS AUTHORIZATIONS: Only use the form No. 960, "Authorization for Release of Health Information Pursuant to HIPAA" and have the Compliance Office review for accuracy. All questions on the one-page form need to be filled in properly and completely.

FAXES & THE FACTS: Each EverCare fax are required to have each page stamped "**Confidential**". The Cover Page is marked "Confidential Fax Cover Sheet" but make sure the other accompanying pages are also stamped as confidential. Why? The HIPAA Privacy Rule requires to have "reasonable safeguard" provided during transmission. Be sure to double-check the fax number for accuracy prior to faxing.

QUICK TIPS: 1] Do not share information on social media; 2] unless encrypted or "secure" is used in subject line, do not send PHI in emails or attachments; 3] re-read emails and check the "to" email addresses before sending; 4] do not leave documents on printers, copiers or faxes.

GIFTS: Remember, all gifts are strictly prohibited by our Members, Patients, Client and vendors. Notify your Supervisor, Executive office or Compliance of any gifts whether in-person, via mail or dropped off to you. Instead of gifts, ask for written testimonials on our "Share Your Experience" form or send a letter to our President|CEO.

"The time is always right to do what is right" Martin Luther King, Jr.